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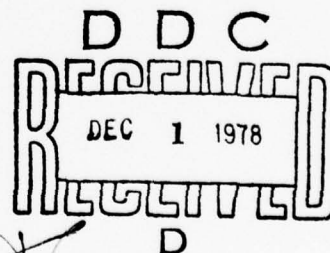
THE HAZARD RANKING AND ALLOCATION METHODOLOGY:
EVALUATION OF TNT WASTEWATERS FOR
CONTINUING RESEARCH EFFORTS

MITCHELL J. SMALL

US ARMY MEDICAL BIOENGINEERING RESEARCH and DEVELOPMENT LABORATORY
Fort Detrick
Frederick, Md. 21701

SEPTEMBER 1978

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20. ABSTRACT (Continue on reverse side if necessary and identify by block number) A major wastewater product from 2,4,6-trinitrotoluene manufacture is "condensate water." Thirty compounds have been determined to occur relatively frequently in "Condensate water," including mono-, di- and trinitrotoluenes, di- and trinitrobenzene, and amino-dinitrotoluenes. Research has been underway to characterize the acute toxic nature of these compounds to aquatic species. Research has also been done to assess the mutagenic activity of these compounds via an Ames/Salmonella microbial bioassay. These research efforts were		

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20. Abstract.

reviewed and future efforts assessed at a meeting at this Laboratory on 23-24 Feb 1978.

As part of this assessment, the Hazard Ranking and Allocation Methodology was performed on compounds of interest. This analysis is based on estimations of hazard and the quality of these estimates. The estimate quality is expressed as a numeric quantity called uncertainty. The most favored research project is that which will bring about the largest decrease in the product (hazard x uncertainty) per research dollar spent.

Data inputs to the methodology include pollutant discharges, populations (human and other species) at risk, characteristics of pollutant travel in streams (flow and travel time), effects of concern and their "cost," and toxicology data relevant to each effect for each compound. The data base was updated to reflect research findings. The procedures used are herein explained.

The systems analysis is performed in two parts. The first part is a hazard analysis. This gives a view of the compounds in a cost perspective and provides a means to weed out research projects which are very marginal in terms of allocation criteria. 2,4,6-Trinitrotoluene posed the greatest hazard of all compounds, although a large portion of this was from discharges not considered "condensate water." Other compounds which ranked high in hazard were 2,3,6-trinitrotoluene, 1,3-dinitrobenzene, and 5-amino-2,4-dinitrotoluene. The major component of hazard was to the environment (as expressed in terms of fish) rather than to humans (in terms of effects from ingestion of contaminated water).

The research allocation analysis was performed on 20 projects. They involved 10 compounds and two studies: (1) a lifetime mammalian study and (2) an in-depth acute aquatic bioassay. The analysis indicated that any compound/acute aquatic bioassay project was favored over any compound/mammalian project. The most promising of the former projects were for 2,4,6-trinitrotoluene, "condensate water" (considering the mixture as an entity), 2,4,6-trinitrotoluene, 1,3-dinitrobenzene and 4-amino-2,4-dinitrotoluene.

This was the first exercise of the methodology in support of munitions pollution criteria management. Thus, the stochastic characteristics of the methodology and how they impact upon results were reviewed in depth.

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SUMMARY

This report documents the systems analysis of the Hazard Ranking and Allocation Methodology for compounds found in wastewaters from operations with 2,4,6-trinitrotoluene. The analysis was done in conjunction with a progress review of Contracts DAMD 17-75-C-5056 and DAMD 17-76-C-6060 with a major goal of planning further toxicological studies.

Prior to execution, a data base amenable to program algorithms had to be assembled. Demographic and hydrologic data had been previously defined. Discharge rates for compounds were, for the most part, based on analyses performed on "condensate water." Some "non-condensate water" discharge sources for 2,4,6-trinitrotoluene and 2,4-dinitrotoluene were identified. Environmental disappearance factors for the compounds were based on available vaporization and photolysis experimental information.

Dose-risk factors for fish effects were based on screening acute aquatic toxicity data from Contract DAMD 17-75-C-5056. Dose-risk factors for mutagenic potential in humans were based on the results of Ames/Salmonella mutagenic bioassays and scaled based on a long-term study of the tumorigenicity of 2,4-dinitrotoluene in rats. Dose-risk factors for chronic, non-carcinogenic effects in humans were either based on past experimental results (available for 2,4,6-trinitrotoluene, 2,4-dinitrotoluene, and 2,6-dinitrotoluene) or on default assumptions.

The hazard ranking was performed first. The algorithms presume all data are accurate, and provide an estimate of yearly adverse socio-economic costs of the consequences of exposure to wastewater. Thirty specific compounds were analyzed, as was "condensate water" as a pseudo-compound. The following hazards were obtained for the 10 highest-ranking compounds:

<u>Compound</u>	<u>Hazard to Humans</u>	<u>Hazard to Fish</u>	<u>Total Hazard</u>
2,4,6-Trinitrotoluene	694	2333	3027
"Condensate water"	169	2173	2342
2,3,6-Trinitrotoluene	12	766	778
2,4-Dinitrotoluene	184	332	516
1,3-Dinitrotoluene	86	410	496
5-Amino-2,4-dinitrotoluene	21	467	488
3,4-Dinitrotoluene	5	185	190
1,3,5-Trinitrobenzene	31	113	144
2,3-Dinitrotoluene	4	122	126
2,6-Dinitrotoluene	10	93	103

The main contribution to the 2,4,6-trinitrotoluene hazard is from sources not associated with "condensate water" discharges. On the basis of

condensate water alone, 2,4,6-trinitrotoluene would have ranked lower than 3,4-dinitrotoluene

These compounds were then processed to determine the predicted effectiveness of proposed research. This involves a stochastic analysis of the increase in confidence estimation that is expected to occur due to the research. Uncertainty factors are required for all elements of hazard data inputs. They are derived on an arbitrary or by consensus basis. The increase in confidence in hazard is represented mathematically by a decrease in the product of hazard x hazard's uncertainty as a result of the research. This decrease divided by research cost is a rational objective factor for the assessment of research. The economic argument for this is presented in the Appendix of the report.

Two projects were assessed for most of the highest-rated compounds above. The first was an in-depth aquatic toxicity test (AAT) at a cost of \$20,000 per compound. The second was an in-depth long-term mammalian feeding study (LTM) at a cost of \$400,000 per compound. The analysis indicates that any of the AAT-projects considered were expected to be more cost-effective than any of the LTM-projects. This was based on four replicate allocation runs, each with 100 stochastic simulations of scenario hazards. The more specific ranking is:

For AAT-projects: 2,4,6-trinitrotoluene
"condensate water"
2,3,6-trinitrotoluene
1,3-dinitrobenzene
5-amino-2,4-dinitrotoluene
2,4-dinitrotoluene
3,4-dinitrotoluene
2,3-dinitrotoluene
1,3,5-trinitrobenzene
2,6-dinitrotoluene

For LTM-projects: 2,4,6-trinitrotoluene
"condensate water"
1,3-dinitrobenzene
5-amino-2,4-dinitrotoluene
1,3,5-trinitrobenzene
2,3,6-trinitrotoluene
3,4-dinitrotoluene
2,6-dinitrotoluene
2,3-dinitrotoluene

The allocation procedures were studied in detail for characteristics of the analysis. Several that were noted were:

a. The assumption of log-normal distribution was reasonable for hazards associated with toxicological study considerations. To some extent, the distribution depends upon the uncertainties assigned to input variables.

b. The assumption of log-normal hazard distribution may become less reasonable for analyses of research projects other than toxicological studies. The allocation procedures may not be conceptually correct in such situations.

c. Uncertainty contributions of important variables were capable of being identified.

d. Because the objective factor for rating research projects involves operations on variables that are stochastically generated, it also has a stochastic nature.

e. The amount of computer time required for allocation analysis will depend upon the criticality of the purpose of the analysis. For a rough analysis, one run with 100 to 300 simulations should suffice. If a more critical assessment is required, replicated runs are recommended. The procedure used in this study is believed to produce rankings which could be one or two positions out of place.

ERRATA

The values of S(FKL) and S(CFS) on line numbers 1291 and 1292, Figure 1, should read 2.2-2 and 6.7-2 liters/mg-year, respectively.

On page 40, the hazard of 2-amino-4,6-dinitrotoluene should be 5.

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INTRODUCTION

The Hazard Ranking and Allocation Methodology (HRAM) was developed by SRI, International for Contract DAMD 17-75-C-5071. HRAM provides a framework which numerically represents the hazard that pollutants pose to human and non-human populations and a rational method for rating proposed research projects. The methodology is described in detail in the Contract Annual Report by Brown.¹ The hazard computational portion of HRAM was operational at the US Army Medical Bioengineering Research and Development Laboratory in August 1976. The allocation methodology was added in December 1976. During 1977, improved algorithms were installed.

SRI, International is also performing research under Contracts DAMD 17-75-C-5056 and DAMD 17-76-C-6050. These studies involve wastewaters associated with 2,4,6-trinitrotoluene (TNT) production and munition loadings. The effort involves the identification of other compounds in such wastewaters; 29 such compounds were identified and their concentrations determined. Initial work was completed on the toxic and mutagenic properties of these compounds; an aquatic toxicity test and a microbial (Ames/Salmonella) mutagenic bioassay, respectively.

Given this number of compounds and the cost of possible additional toxicological studies, a meeting was held on 23-24 February 1978 to review research results from these contracts and plan future studies. As part of this assessment, a HRAM analysis was performed. This was the first full scale test of HRAM. This report documents the information which went into the analysis and the derived results. It also reviews aspects of the analysis that need to be considered in the interpretation of results, and aspects that need improvement.

TNT WASTEWATERS

Three general types of TNT wastewater are known: those from TNT production; those from incorporation of TNT with other explosives, primarily cyclotrimethylenetrinitramine (RDX); and those from loading of explosive formulations containing TNT into munitions. The HRAM analysis performed covered the first two types; for completeness, all three are discussed.

Production Wastewaters

TNT is produced by the stepwise nitration of toluene in the presence of sulfuric acid. The raw product contains about 96 percent TNT, 3 percent of other five trinitrotoluene isomers, at least two dinitrotoluene isomers, dinitrobenzene and trinitrobenzene.² The TNT isomers detract from the explosive and mechanical properties of TNT. They are largely removed by washing the molten raw product with "sellite," a basic

solution of sodium sulfite. The spent "sellite" has an intense red color (to the extent that it is almost black) and forms the major component of TNT wastewaters that has been considered for abatement from production. Other usual wastewater sources are: waters from scrubbers that collect fumes from the nitrators and TNT dust from bagging operations; routine washdowns of floors; washdowns of occasional spills; and some spent acid wastewater from initial washing of the raw product prior to the "sellite" wash.

TNT production at Volunteer, Radford, and Joliet Army Ammunitions Plants would involve discharges to surface waters.* At present, none of these plants are in TNT production.

At Radford Army Ammunition Plant, the spent "sellite" is segregated from the other wastewaters and concentrated in open vats. The concentrate is sold to paper mills. The other wastewaters are subjected to settling and pH adjustment treatment prior to discharge.

At Volunteer and Joliet Army Ammunition Plants, all wastewaters are collected and concentrated in a partial evaporator. The more volatile compounds tend to distill into an aqueous solution called "condensate water." This water is discharged to surface streams, and is the TNT wastewater of concern at these plants. The concentrate is either sold to paper mills or incinerated. The compounds that have been identified and concentrations in "condensate water" analyzed are listed in Table 1.

Incorporation Wastewaters

Wastewaters from the incorporation of TNT with RDX are confined to Holston Army Ammunition Plant. In this process, the two explosives are added to a steam kettle, heated, and then transferred in molten form to a casting vessel. The molten mixture drips out of the vessel, solidifies, and is packaged. Wastewaters occur from the water floated from the molten mixture (the RDX is slightly moist when added to TNT), washdowns, and fume scrubbers.

Munition Loadings Wastewaters

These wastewaters arise from washdown of floors and from steam-out of rejected fills. These wastewaters, when discharged to surface waters, are first treated with activated charcoal, which greatly reduces TNT concentration. Where not so treated, wastewaters are stored in open sumps or ponds where evaporation or percolation can occur. In either case, the volumes of wastewaters involved are not large compared to production

* Newport Army Ammunition Plant also has a TNT production facility. However, total incineration of all TNT wastewaters is expected to be performed.

TABLE 1. COMPOUNDS IN "CONDENSATE WATER" AND THEIR
HRAH MNEMONIC CODES

Compound	Code
2,4,6-Trinitrotoluene	TNT
2,3,6-Trinitrotoluene	T11
Toluene	TOL
2-Nitrotoluene	2NT
4-Nitrotoluene	4NT
2,3-Dinitrotoluene	23D
2,4-Dinitrotoluene	24D
2,5-Dinitrotoluene	25D
2,6-Dinitrotoluene	26D
3,4-Dinitrotoluene	34D
3,5-Dinitrotoluene	35D
1,3-Dinitrobenzene	DNB
3,5-Dinitroaniline	DNA
3-Methyl-2-nitrophenol	3DP
5-Methyl-2-nitrophenol	5DP
3-Nitrobenzonitrile	3NB
4-Nitrobenzonitrile	4NB
2-Amino-4-nitrotoluene	AN6
2-Amino-6-nitrotoluene	AN8
3-Amino-4-nitrotoluene	AN7
1,3,5-Trinitrobenzene	TNB
2-Amino-3,6-dinitrotoluene	ADB
2-Amino-4,6-dinitrotoluene	2AD
3-Amino-2,4-dinitrotoluene	AD9
3-Amino-2,6-dinitrotoluene	BAD
4-Amino-2,6-dinitrotoluene	4AD
4-Amino-3,5-dinitrotoluene	ADC
5-Amino-2,4-dinitrotoluene	ABD
2,4-Dinitro-5-methylphenol	DNP
1,5-Dimethyl-2,4-dinitrobenzene	DDB
"Condensate Water" (Composite)	TCP

wastewaters. Moreover, since product TNT is used in this operation, many compounds that are in "condensate water" would not be expected in these discharged wastewaters.[†] Finally, HRAM algorithms have not been developed to handle the pond-storage situation.

HRAM AS APPLIED TO SURFACE WATER POLLUTION

A brief review of the methodology is presented to explain data inputs and processing. For more detail, either reference 1 or 3 should be consulted. HRAM data inputs are based on available hard data, reasonable estimates, or default values. Quite often, inputs must be transformed for use in HRAM. Where pertinent to the discussion, these transformations will be reviewed. Otherwise, reference 3 should be consulted.

Populations considered subject to pollutants are defined (N).^{††} For humans (HUM), these are communities which draw drinking water supplies from the surface water containing the pollutant. For fish (FSH), these are some representation of the fish population expected in a reach of the surface water. For each population group, a representative flow rate of the surface water (SMF) and a travel time for the pollutant to pass from its point of entry to surface water to the population (SMT) is specified. For fish, this is generally taken at the spatial mid-point of the population group.

For each compound, a mass loading rate of the pollutant to surface water (Q) is defined. A water treatment retention factor (R) is also defined, which accounts for raw water treatment procedures in waterworks. An environmental disappearance factor (LMD) is defined, which presupposes that a first-order decay of the pollutant with travel time occurs. Then, for each population group involved, a pollutant concentration is computed:

$$C = (1/SMF) * Q * R * \exp(-LMD * SMT) \quad (1)$$

For each compound, adverse effects of concern are defined. Each effect is assigned a socioeconomic cost (V). A linear relation is presumed to apply between the dose of a compound and the probability that an adverse effect will occur in a year to an "average" individual in a population. The slope of this dose-risk relation (S) is used in HRAM. HRAM allows for use of a threshold; however, practice has been to assume no threshold. For effects considered of a chronic nature in humans, a concentration-dose conversion factor (SMB) is applied. HRAM provides a SMB of 1.0 if this factor is not specified. This allows for processing of S in terms of concentration for fish populations.

[†] However, some could occur in environmental processes that TNT undergoes. See Pollution Discharge Rates, page 30.

^{††} The notations that appear are used in HRAM.

The yearly hazard of a given compound, for a given effect, and to a given population group[†] is computed:

$$H = C * SMB * S * V * N \quad (2)$$

Equation (2) can be summed to provide less restricted hazards, such as:

$$\text{Hazard (one effect and compound)} = \sum_{\text{Populations}} H \quad (3)$$

and

$$\text{Hazard (one compound)} = \sum_{\text{Effects}} \sum_{\text{Populations}} H \quad (4)$$

Equation (2) would be accurate, within the scope of the assumptions, if the variables were well known, which is not usually the case. The allocation concept is based on this. An uncertainty is associated with each variable. The uncertainty numerically represents the existing state of knowledge about the variable. Reference 3 largely deals with current practices in the assignment of uncertainties.

For allocation purposes, the variables are processed as probability distributions, to quantitatively account for their inaccuracy. Three options exist for the type of distribution, and with each option, a definition of uncertainty in terms of probability concepts. If V is any variable, \bar{V} its estimated mean [the value used in Equation (1) or (2)] and U its uncertainty, the options are:

1. Additive -- V is normally distributed with estimated mean \bar{V} and standard deviation $U/2$. U has the format "+ nn."
2. Percentage -- V/\bar{V} is normally distributed with estimated mean of 1.0 and standard deviation $U/200$. U has the format "+ nn P."
3. Log-normal -- $\log V$ is normally distributed with estimated mean $\log \bar{V}$ and standard deviation $\log \bar{U}$. U has the format "* nn."

Hazard is also some form of probability distribution and has an uncertainty. The statistical inference given to hazard and its uncertainty, stated for a log-normal distribution, is: let \bar{H} be the value of uncertainty computed by either Equations (2), (3) or (4). Let " $* U_H$ " be its uncertainty. Then, if h is any random selection from the distribution,

[†] Strictly speaking, hazard is qualified by six subscripts. This explanation has been restricted to surface water. Moreover, each population group is in terms of a location, a type of population (human or fish, for example) and a numerical index.

$$\text{Probability } (\bar{H}/U_H \leq h \leq \bar{H}U_H) \approx 0.95 \quad (5)$$

The 95 percent range that is associated with hazard and its uncertainty is central to the allocation methodology. Research is considered a process which improves upon the accuracy of one or more variables. This can be expressed as a reduction in the variable uncertainty to a defined numerical value. This is reflected in a reduction in the range of hazard as stated in Equation (5). This reduction was shown in reference 1 to represent a benefit. This benefit divided by research cost provides a ratio which can be used as an objective factor to compare different research projects. Appendix A reviews the economic argument behind this concept.

Deterministically, the uncertainty of hazard is not readily computed. Stochastically, it is computable if the hazard distribution is specified in advance. HRAM assumes this distribution is log-normal. Monte-Carlo simulation techniques can then be used. Several iterations are required; in each iteration, Equation (2) is evaluated based on random selections of variable values according to their distributions. Then, if required, summations to Equations (3) or (4) are performed. After the second iteration, the log-normal mean and uncertainty of hazard can be back-calculated. This process is performed twice per iteration, once for the current situation, once for the post-research situation. The hazard ranges for the current and post-research situations are then computed and the ratio determined.

THE DATA BASE

The data required to compute hazard for the TNT wastewater situation appears in Figure 1. Each line, which is a data entry, has an identification number on the right hand side (Line ID.). Line numbers will be cited. All variables have subscripts; the subscripts are defined first. The subscript for surface water transport, H20, is pre-defined. Subscripts are in the form of three-character mnemonic codes. The subscripts corresponding to locations occur on lines 30 - 51. The subscripts corresponding to compounds occur on lines 80 - 400. The subscripts corresponding to effects occur on lines 450 - 470. The subscripts corresponding to population types occur on lines 490 - 500. Numerical subscripts are used to define specific population groups.

Data documentation is included in two notebooks.^{4,5} These notebooks include the background and computations employed to develop the data. Where other references are not herein cited, these notebooks are the data sources.

RUN NO.	CLAS	DATE	TIME	CYSJ	LISTING OF MODULE	TSTIR
FFFFKL					FISH KILL	00000470
PTPHUM					HUMAN	00000490
PTPESH					FISH	00000500
N RADH2CFSH	1	70000 CT			* L-01 TSTIR#2/13	00000551
N RADH2CFSH	1	12+3 \$F			* 2-3 TSTIR#2/13	00000610
N RADH2CFSH	2	60+3 \$F			* 2-3 TSTIR#2/13	00000611
N RADH2CFSH	3	54+3 \$F			* 2-3 TSTIR#2/13	00000612
N RADH2CFSH	4	450+3 \$F			* 2-3 TSTIR#2/13	00000613
N VCLH2CFSH	1	300000 CT			* L-1 TSTIR#2/15	00000630
N VCLH2CFSH	2	225000 CT			* L-1 TSTIR#2/15	00000631
N VCLH2CFSH	1	3-9+3 \$F			* 2-3 TSTIR#2/15	00000671
N VCLH2CFSH	2	3-3+4 \$F			* 2-3 TSTIR#2/15	00000672
N VCLH2CFSH	3	9-0+5 \$F			* 2-3 TSTIR#2/15	00000673
N VCLH2CFSH	4	2-5+6 \$F			* 2-3 TSTIR#2/15	00000674
N VCLH2CFSH	1	35000 CT			* LUPMORRISTOWN	00000750
N VCLH2CFSH	2	18600 CT			* LOP E/NE KNOX UD	00000760
N VCLH2CFSH	3	1-8+5 CT			* DUP KNOXVILLE	00000770
N VCLH2CFSH	4	15000 CT			* L-01 TSTIR#2/17	00000780
N VCLH2CFSH	1	3-2+3 \$F			* 2-3 TSTIR#2/17	00000800
N VCLH2CFSH	2	571+3 \$F			* 2-3 TSTIR#2/17	00000801
N VCLH2CFSH	3	54000+3 \$F			* 2-3 TSTIR#2/17	00000802
N VCLH2CFSH	1	42000 CT			* 2E4 PEORIA AREA	00000830
N VCLH2CFSH	1	1-3+6 \$F			* 2-3 TSTIR#2/19	00000831
N VCLH2CFSH	2	1-4+6 \$F			* 2-3 TSTIR#2/19	00000832
N VCLH2CFSH	3	5-7+6 \$F			* 2-3 TSTIR#2/19	00000833
V FSHCE		3+4 \$S /CT			* L-01 HUM CHR REC	00000881
V FSHCE		L-0 \$S /\$F			* L-01 CHRONIC FISH	00000882
V HUMCFC		3+5 \$S /CT			* L-01 HUM CHR SEVERE	00000883
V HUMC		3+5 \$S /CT			* L-01 CANCER	00000884
V FSHKFL		L-0 \$S /\$F			* L-01 FISH KILL	00000885
SMB240P2CC		500 LT /YR			* L-01	00000950
SMB2TCH2CC		500 LT /YR			* L-01	00000951
SMB2NTH2CC		500 LT /YR			* L-01	00000952
SMB2DP2CC		500 LT /YR			* L-01	00000953
SMB2SP2CC		500 LT /YR			* L-01	00000954
SMB34CP2CC		500 LT /YR			* L-01	00000955
SMB35DP2CC		500 LT /YR			* L-01	00000956
SMBT1LP2CC		500 LT /YR			* L-01	00000957
SMBAN6H2CC		500 LT /YR			* L-01	00000958
SMBANBH2CC		500 LT /YR			* L-01	00000959
SMBANTP2CC		500 LT /YR			* L-01	00000960
SMBACBP2CC		500 LT /YR			* L-01	00000961
SMBADSH2CC		500 LT /YR			* L-01	00000962
SMBACCH2CC		500 LT /YR			* L-01	00000963
SMBEBNH2CC		500 LT /YR			* L-01	00000964
SMBRNBH2CC		500 LT /YR			* L-01	00000965
SMBRNHB2CC		500 LT /YR			* L-01	00000966
SMBRNHB2CC		500 LT /YR			* L-01	00000967
SMBONNB2CC		500 LT /YR			* L-01	00000968
SMBONCB2CC		500 LT /YR			* L-01	00000969
SMBONAH2CC		500 LT /YR			* L-01	00000970
SMB3DPH2CC		500 LT /YR			* L-01	00000971
SMB3DPH2CC		500 LT /YR			* L-01	00000972
SMB4NP2CC		500 LT /YR			* L-01	00000973

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RUN NO.	DATE	TIME	04/10/78	0950	LISTING OF MODULE TSTIB	02/16/78
SWB3NDH2CC	500 LT /YR	1.01	00000574	02/16/78		
SWB3NDH2CC	500 LT /YR	1.01	00000575	02/16/78		
SWB4ADH2CC	500 LT /YR	1.01	00000580	01/11/77		
SWB2ADH2CC	500 LT /YR	1.01	00000990	01/11/77		
SWB26DH2CC	500 LT /YR	1.01	00001020	01/11/77		
SWB2CPH2CC	500 LT /YR	1.01	00001061	11/04/77		
SWB2CPH2CC	500 LT /YR	1.01	00001062	11/04/77		
SWB2CPH2CC	500 LT /YR	1.01	00001180	02/16/78		
SWB2CPH2CC	500 LT /YR	1.01	00001190	01/11/77		
SWB2CPH2CC	500 LT /YR	1.01	00001203	02/16/78		
SWB2CPH2CC	500 LT /YR	1.01	00001204	11/07/77		
SWB2CPH2CC	500 LT /YR	1.01	00001205	01/11/77		
SWB2CPH2CC	500 LT /YR	1.01	00001206	11/07/77		
SWB2CPH2CC	500 LT /YR	1.01	00001207	02/16/78		
SWB2CPH2CC	500 LT /YR	1.01	00001250	11/10/77		
SWB2CPH2CC	500 LT /YR	1.01	00001251	01/11/77		
SWB2CPH2CC	500 LT /YR	1.01	00001252	11/10/77		
SWB2CPH2CC	500 LT /YR	1.01	00001253	01/12/77		
SWB2CPH2CC	500 LT /YR	1.01	00001254	11/13/77		
SWB2CPH2CC	500 LT /YR	1.01	00001255	01/11/77		
SWB2CPH2CC	500 LT /YR	1.01	00001256	03/15/77		
SWB2CPH2CC	500 LT /YR	1.01	00001280	02/16/78		
SWB2CPH2CC	500 LT /YR	1.01	00001281	02/16/78		
SWB2CPH2CC	500 LT /YR	1.01	00001282	02/16/78		
SWB2CPH2CC	500 LT /YR	1.01	00001290	02/16/78		
SWB2CPH2CC	500 LT /YR	1.01	00001291	02/16/78		
SWB2CPH2CC	500 LT /YR	1.01	00001292	02/16/78		
SWB2CPH2CC	500 LT /YR	1.01	00001320	02/16/78		
SWB2CPH2CC	500 LT /YR	1.01	00001321	11/22/77		
SWB2CPH2CC	500 LT /YR	1.01	00001322	01/14/77		
SWB2CPH2CC	500 LT /YR	1.01	00001323	01/14/77		
SWB2CPH2CC	500 LT /YR	1.01	00001324	11/22/77		
SWB2CPH2CC	500 LT /YR	1.01	00001326	01/14/77		
SWB2CPH2CC	500 LT /YR	1.01	00001327	01/14/77		
SWB2CPH2CC	500 LT /YR	1.01	00001330	02/16/78		
SWB2CPH2CC	500 LT /YR	1.01	00001331	02/16/78		
SWB2CPH2CC	500 LT /YR	1.01	00001332	02/16/78		
SWB2CPH2CC	500 LT /YR	1.01	00001333	02/16/78		
SWB2CPH2CC	500 LT /YR	1.01	00001334	02/16/78		
SWB2CPH2CC	500 LT /YR	1.01	00001335	02/16/78		
SWB2CPH2CC	500 LT /YR	1.01	00001336	02/16/78		
SWB2CPH2CC	500 LT /YR	1.01	00001337	02/16/78		
SWB2CPH2CC	500 LT /YR	1.01	00001338	02/16/78		
SWB2CPH2CC	500 LT /YR	1.01	00001339	02/16/78		
SWB2CPH2CC	500 LT /YR	1.01	00001341	02/16/78		
SWB2CPH2CC	500 LT /YR	1.01	00001342	02/16/78		
SWB2CPH2CC	500 LT /YR	1.01	00001343	02/16/78		
SWB2CPH2CC	500 LT /YR	1.01	00001344	02/16/78		
SWB2CPH2CC	500 LT /YR	1.01	00001345	02/16/78		
SWB2CPH2CC	500 LT /YR	1.01	00001346	02/16/78		
SWB2CPH2CC	500 LT /YR	1.01	00001347	02/16/78		
SWB2CPH2CC	500 LT /YR	1.01	00001348	02/16/78		

RUN NO.	6145	DATE	04/10/78	TIME	0950	LISTING OF MODULE TST18	
S	CEAH2CCFS			3.8-2	LT /MG	YR	* 15 STD EXTRAP
S	DNH2CCFS			2.0-2	LT /MG	YR	* 15 STD EXTRAP
S	3CPH2CCFS			1.6-2	LT /MG	YR	* 15 STD EXTRAP
S	5DPH2CCFS			1.4-2	LT /MG	YR	* 15 STD EXTRAP
S	4NDP2CCFS			1.2-2	LT /MG	YR	* 15 STD EXTRAP
S	3NDH2CCFS			6.2-3	LT /MG	YR	* 15 STD EXTRAP
S	DNPH2CCFS			9.4-2	LT /MG	YR	* 15 STD EXTRAP
S	TCPH2CC			1-4/GM			* 25 WEIGHTED DENT
S	TCPH2CCG			5-6/GM			* 33 TST18#2/65
S	TCPH2CCT			5-5/GM			* 55 TST18#2/65
S	TCPH2CCFKL			1.4-2	LT /MG	YR	* 4 TST18#2/66
S	TCPH2CCFS			4.2-2	LT /MG	YR	* 15 TST18#2/66
S	TCLH2CCFKL			8-3	LT /MG	YR	* 4 LC50 SCALE
S	2NTH2CCFKL			2.6-3	LT /MG	YR	* 4 LC50 SCALE
S	4NTH2CCFKL			8.3-3	LT /MG	YR	* 4 LC50 SCALE
S	23DH2CCFKL			5.3-2	LT /MG	YR	* 4 LC50 SCALE
S	25DH2CCFKL			7.7-2	LT /MG	YR	* 4 LC50 SCALE
S	34DH2CCFKL			6.7-2	LT /MG	YR	* 4 LC50 SCALE
S	35DH2CCFKL			4.6-3	LT /MG	YR	* 4 LC50 SCALE
S	T11H2CCFKL			8.3-1	LT /MG	YR	* 4 LC50 SCALE
S	AN6H2CCFKL			4.4-3	LT /MG	YR	* 4 LC50 SCALE
S	AN8H2CCFKL			7.6-3	LT /MG	YR	* 4 LC50 SCALE
S	AN7H2CCFKL			1.7-2	LT /MG	YR	* 4 LC50 SCALE
S	ACBH2CCFKL			1.3-1	LT /MG	YR	* 4 LC50 SCALE
S	AC9H2CCFKL			1.2-2	LT /MG	YR	* 4 LC50 SCALE
S	BADH2CCFKL			2.1-2	LT /MG	YR	* 4 LC50 SCALE
S	ACCH2CCFKL			7.6-3	LT /MG	YR	* 4 LC50 SCALE
S	ABDH2CCFKL			4.2-2	LT /MG	YR	* 4 LC50 SCALE
S	TN3H2CCFKL			9.7-2	LT /MG	YR	* 4 LC50 SCALE
S	DN8H2CCFKL			1.4-2	LT /MG	YR	* 4 LC50 SCALE
S	3DBH2CCFKL			1.3-2	LT /MG	YR	* 4 LC50 SCALE
S	DNAH2CCFKL			6.8-3	LT /MG	YR	* 4 LC50 SCALE
S	3CPH2CCFKL			5.3-3	LT /MG	YR	* 4 LC50 SCALE
S	5DPH2CCFKL			4.7-3	LT /MG	YR	* 4 LC50 SCALE
S	4NDH2CCFKL			4.1-3	LT /MG	YR	* 4 LC50 SCALE
S	3NDH2CCFKL			2.1-3	LT /MG	YR	* 4 LC50 SCALE
S	DNPH2CCFKL			3.1-2	LT /MG	YR	* 4 LC50 SCALE
S	TCLH2CC			2.5-7/GM			* 20 CNT-SCALED
S	2NTH2CC			1.5-6/GM			* 20 CNT-SCALED
S	4NTH2CC			6.0-6/GM			* 20 CNT-SCALED
S	23DH2CC			1.4-4/GM			* 20 CNT-SCALED
S	25DH2CC			2.2-4/GM			* 20 CNT-SCALED
S	34DH2CC			8.0-5/GM			* 20 CNT-SCALED
S	35DH2CC			1.5-4/GM			* 20 CNT-SCALED
S	AN6H2CC			5.6-5/GM			* 20 CNT-SCALED
S	AN8H2CC			3.7-5/GM			* 20 CNT-SCALED
S	AN7H2CC			1.4-4/GM			* 20 CNT-SCALED
S	ADBH2CC			4.5-4/GM			* 20 CNT-SCALED
S	AC9H2CC			7.8-5/GM			* 20 CNT-SCALED
S	BADH2CC			8.4-5/GM			* 20 CNT-SCALED
S	A7CH2CC			4.9-5/GM			* 20 CNT-SCALED
S	49DH2CC			8.7-5/GM			* 20 CNT-SCALED
S	TN8H2CC			1.1-3/GM			* 20 CNT-SCALED
S	DN8H2CC			1.5-4/GM			* 20 CNT-SCALED

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Run No.	6165	DATE	04/10/78	TIME	0950	LISTING OF MODULE	TSTIE	
S	DCBP2CC		5.8-5/GM			20 ENT-SCALED	00001478	02/16/78
S	DNAP2CC		1.8-3/GM			20 ENT-SCALED	00001479	02/16/78
S	3CPH2CC		1.5-6/GM			20 ENT-SCALED	00001480	03/03/78
S	5CPH2CC		1.5-6/GM			20 ENT-SCALED	00001481	03/03/78
S	PNPH2CC		3.4-5/GM			20 ENT-SCALED	00001482	02/16/78
S	TLIH2CC		1.7-3/GM			20 ENT-SCALED	00001483	02/16/78
S	4NDH2CC		3.3-5/GM			20 ENT-SCALED	00001484	02/16/78
S	3NDH2CC		1.2-4/GM			20 ENT-SCALED	00001485	02/16/78
S	TCPVCLH20		2.2+4 KG /YR			3.0 TSTIE#2/66	00001730	03/08/78
Q	TCPJCLH20		2.2+4 KG /YR			5.0 TSTIE#2/66	00001731	03/08/78
Q	26DVCLH20		5.1+3 KG /YR			3.0 TSTIE#2/57	00001760	03/08/78
Q	26DJCLH20		5.1+3 KG /YR			5.0 TSTIE#2/57	00001761	03/08/78
Q	24DVCLH20		1+4 KG /YR			3 TSTIE#2/46	00001800	11/25/77
Q	24DRACH20		4.9+3 KG /YR			4.0 TSTIE#2/46	00001810	01/25/77
Q	24DJCLH20		1+4 KG /YR			5 TSTIE#2/46	00001820	11/25/77
Q	4ADVCLH20		380 KG /YR			3 VAAP SAMPLES	00001831	03/08/78
Q	24DVCLH20		20 KG /YR			5 VAAP SAMPLES	00001832	03/08/78
Q	TLVCLH20		80 KG /YR			3 VAAP SAMPLES	00001833	03/08/78
Q	2NTVCLH20		15 KG /YR			3 VAAP SAMPLES	00001834	03/08/78
Q	4NTVCLH20		30 KG /YR			3 VAAP SAMPLES	00001835	03/08/78
Q	23DVCLH20		280 KG /YR			5 VAAP SAMPLES	00001836	03/08/78
Q	25DVCLH20		160 KG /YR			3 VAAP SAMPLES	00001837	03/08/78
Q	34DVCLH20		270 KG /YR			3 VAAP SAMPLES	00001838	03/08/78
Q	35DVCLH20		260 KG /YR			3 VAAP SAMPLES	00001839	03/08/78
Q	TLVCLH20		190 KG /YR			5 VAAP SAMPLES	00001840	03/08/78
Q	AN6VCLH20		10 KG /YR			3 SAMPLES	00001841	02/16/78
Q	AN5VCLH20		25 KG /YR			5 VAAP SAMPLES	00001842	03/08/78
Q	AN7VCLH20		1.5 KG /YR			5 VAAP SAMPLES	00001843	03/08/78
Q	AE8VCLH20		3 KG /YR			3 VAAP SAMPLES	00001844	03/17/78
Q	AD9VCLH20		620 KG /YR			5 VAAP SAMPLES	00001845	03/08/78
Q	14DVCLH20		410 KG /YR			3 VAAP SAMPLES	00001846	03/08/78
Q	ADCVCLH20		90 KG /YR			3 VAAP SAMPLES	00001847	03/08/78
Q	AD9VCLH20		780 KG /YR			3 VAAP SAMPLES	00001848	03/08/78
Q	THVCLH20		110 KG /YR			5 VAAP SAMPLES	00001849	03/08/78
Q	DN8VCLH20		2930 KG /YR			3 VAAP SAMPLES	00001850	03/08/78
Q	DB9VCLH20		170 KG /YR			3 VAAP SAMPLES	00001851	03/08/78
Q	DN9VCLH20		55 KG /YR			3 VAAP SAMPLES	00001852	03/08/78
Q	3CPVCLH20		15 KG /YR			5 VAAP SAMPLES	00001853	03/08/78
Q	5DPVCLH20		100 KG /YR			5 VAAP SAMPLES	00001854	03/08/78
Q	4NDVCLH20		5 KG /YR			5 VAAP SAMPLES	00001855	03/08/78
Q	3NDVCLH20		1.5 KG /YR			5 VAAP SAMPLES	00001856	03/08/78
Q	DNPVCLH20		60 KG /YR			5 VAAP SAMPLES	00001857	03/08/78
Q	4ADJCLH20		380 KG /YR			7 VAAP EXTRAP	00001858	03/08/78
Q	2ADJCLH20		20 KG /YR			7 VAAP EXTRAP	00001859	03/08/78
Q	TLJCLH20		80 KG /YR			5 VAAP EXTRAP	00001860	03/08/78
Q	2NTJCLH20		15 KG /YR			5 VAAP EXTRAP	00001861	03/08/78
Q	4NTJCLH20		30 KG /YR			5 VAAP EXTRAP	00001862	03/08/78
Q	23DJCLH20		230 KG /YR			7 VAAP EXTRAP	00001863	03/08/78
Q	25DJCLH20		160 KG /YR			5 VAAP EXTRAP	00001864	03/08/78
Q	34DJCLH20		270 KG /YR			5 VAAP EXTRAP	00001865	03/08/78
Q	35DJCLH20		260 KG /YR			5 VAAP EXTRAP	00001866	03/08/78
Q	11JCLH20		190 KG /YR			7 VAAP EXTRAP	00001867	03/08/78
Q	AN6JCLH20		10 KG /YR			5 VOL EST	00001868	02/16/78
Q	AN6JCLH20		25 KG /YR			7 VAAP EXTRAP	00001869	02/16/78

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DATE	TIME	0950	LISTING OF MODULE TSTIB	03/08/78
1.5 KG /YR	1.5 KG /YR	1.5 KG /YR	7 VAAP EXTRAP	00001870
3 KG /YR	3 KG /YR	3 KG /YR	5 VAAP EXTRAP	00001871
620 KG /YR	620 KG /YR	620 KG /YR	7 VAAP EXTRAP	00001872
410 KG /YR	410 KG /YR	410 KG /YR	5 VAAP EXTRAP	00001873
90 KG /YR	90 KG /YR	90 KG /YR	5 VAAP EXTRAP	00001874
780 KG /YR	780 KG /YR	780 KG /YR	5 VAAP EXTRAP	00001875
110 KG /YR	110 KG /YR	110 KG /YR	7 VAAP EXTRAP	00001876
2930 KG /YR	2930 KG /YR	2930 KG /YR	5 VAAP EXTRAP	00001877
170 KG /YR	170 KG /YR	170 KG /YR	5 VAAP EXTRAP	00001878
55 KG /YR	55 KG /YR	55 KG /YR	5 VAAP EXTRAP	00001879
15 KG /YR	15 KG /YR	15 KG /YR	7 VAAP EXTRAP	00001880
100 KG /YR	100 KG /YR	100 KG /YR	7 VAAP EXTRAP	00001881
5 KG /YR	5 KG /YR	5 KG /YR	7 VAAP EXTRAP	00001882
1.5 KG /YR	1.5 KG /YR	1.5 KG /YR	7 VAAP EXTRAP	00001883
60 KG /YR	60 KG /YR	60 KG /YR	7 VAAP EXTRAP	00001884
690 KG /YR	690 KG /YR	690 KG /YR	5 VAAP SAMPLES	00002040
690 KG /YR	690 KG /YR	690 KG /YR	7 VAAP EXTRAP	00002041
1.44 KG /YR	1.44 KG /YR	1.44 KG /YR	2.0	00002050
1.4 KG /YR	1.4 KG /YR	1.4 KG /YR	10 TSTIB#2/38	00002070
6.25 DY	6.25 DY	6.25 DY	1.3 TSTIB#121	00002080
0.57 DY	0.57 DY	0.57 DY	1.4 TSTIB#121	00002090
2.87 DY	2.87 DY	2.87 DY	1.5 TSTIB#121	00002100
6.07 DY	6.07 DY	6.07 DY	1.60 TSTIB#121	00002110
5.6 DY	5.6 DY	5.6 DY	1.2 TSTIB#2/111	00002120
1.35 DY	1.35 DY	1.35 DY	1.5 TSTIB#135	00002170
32 DY	32 DY	32 DY	1.5 TSTIB#135	00002171
2.22 DY	2.22 DY	2.22 DY	1.5 TSTIB#135	00002172
8.31 DY	8.31 DY	8.31 DY	1.5 TSTIB#135	00002180
1.15+11 LT /YR	1.15+11 LT /YR	1.15+11 LT /YR	1.01 TSTIB#2/111	00002230
8.56+11 LT /YR	8.56+11 LT /YR	8.56+11 LT /YR	1.1 TSTIB#135	00002231
8.74+11 LT /YR	8.74+11 LT /YR	8.74+11 LT /YR	1.1 TSTIB#135	00002232
9.37+11 LT /YR	9.37+11 LT /YR	9.37+11 LT /YR	1.1 TSTIB#135	00002233
1.02+12 LT /YR	1.02+12 LT /YR	1.02+12 LT /YR	2.0	00002260
1.28+13 LT /YR	1.28+13 LT /YR	1.28+13 LT /YR	1.4 TSTIB#121	00002270
2.85+12 LT /YR	2.85+12 LT /YR	2.85+12 LT /YR	1.5 TSTIB#121	00002280
3.10+12 LT /YR	3.10+12 LT /YR	3.10+12 LT /YR	1.5 TSTIB#121	00002290
3.50+12 LT /YR	3.50+12 LT /YR	3.50+12 LT /YR	1.60 TSTIB#121	00002300
41.0 DY	41.0 DY	41.0 DY	2.0 TSTIB#2/114	00002310
55.0 DY	55.0 DY	55.0 DY	2.0 TSTIB#2/114	00002350
3.0 DY	3.0 DY	3.0 DY	1.5	00002360
10.0 DY	10.0 DY	10.0 DY	1.5	00002370
30.0 DY	30.0 DY	30.0 DY	1.5	00002380
40.0 DY	40.0 DY	40.0 DY	1.5	00002400
44.7 DY	44.7 DY	44.7 DY	1.5 TSTIB#131-132	00002401
79.0 DY	79.0 DY	79.0 DY	1.5 TSTIB#131-132	00002402
80.0 DY	80.0 DY	80.0 DY	1.5 TSTIB#131-132	00002403
89.0 DY	89.0 DY	89.0 DY	1.7 TSTIB#137	00002450
0.06 DY	0.06 DY	0.06 DY	1.7 TSTIB#137	00002451
2.64 DY	2.64 DY	2.64 DY	1.7 TSTIB#137	00002452
64.0 DY	64.0 DY	64.0 DY	1.01 TSTIB#2/114	00002480
38.00 FT3/SC	38.00 FT3/SC	38.00 FT3/SC	1.01 TSTIB#2/114	00002490
46000 FT3/SC	46000 FT3/SC	46000 FT3/SC	3.0 TSTIB#128	00002530
5.52+11 LT /YR	5.52+11 LT /YR	5.52+11 LT /YR	3.0 TSTIB#128	00002540
1.38+11 LT /YR	1.38+11 LT /YR	1.38+11 LT /YR		

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Run No.	Elem	Date	34/10/76	Time	0950	Listing of Module	TSIP	
SWFVLESP	3	2-02+12	LT	YR		* 2-0 TST18#128	33002550	05/15/76
SWFVLESP	4	6-90+12	LT	YR		* 2-0 TST18#128	00002560	05/15/76
SWFHOLHUM	1	3-78+12	LT	YR		* 1-01 TST18#130-131	00002580	10/05/76
SWFHOLHUM	2	4-20+12	LT	YR		* 1-05 TST18#130-131	00002581	10/05/76
SWFHOLHUM	3	11-70+12	LT	YR		* 1-05 TST18#130-131	00002582	10/05/76
SWFHOLHUM	4	2-0+13	LT	YR		* 1-01 TST18#2/115	00002583	04/26/77
SWFHOLHUM	5	3-92+10	LT	YR		* 2-0 TST18#137	00002630	12/22/76
SWFHOLHUM	6	5-89+11	LT	YR		* 1-2 TST18#137	00002631	12/22/76
SWFHOLHUM	7	5-65+11	LT	YR		* 1-2 TST18#137	00002632	12/22/76
SWFHOLHUM	8	71/7YR				* 58P VOL2PHOT2	00002660	03/08/78
SWFHOLHUM	9	25/7YR				* 33P VOL1PHCT1	00002680	03/08/78
SWFHOLHUM	10	77/7YR				* 41P VOL1PHCT1	00002681	03/08/78
SWFHOLHUM	11	20/7YR				* 66P VOL2PHCT3	00002682	03/08/78
SWFHOLHUM	12	98/7YR				* 33P VOL1PHCT1	00002720	03/08/78
SWFHOLHUM	13	38/7YR				* 45P WEIGHTED AVE	00002740	03/08/78
SWFHOLHUM	14	660/7YR				* 58P VOL2PHCT3	00002811	03/08/78
SWFHOLHUM	15	126/7YR				* 49P VOL2PHCT2	00002812	03/08/78
SWFHOLHUM	16	185/7YR				* 49P VOL2PHCT2	00002813	03/08/78
SWFHOLHUM	17	27/7YR				* 33P VOL1PHCT1	00002814	03/08/78
SWFHOLHUM	18	107/7YR				* 33P VOL1PHCT1	00002815	03/08/78
SWFHOLHUM	19	12/7YR				* 41P VOL1PHCT1	00002816	03/08/78
SWFHOLHUM	20	17/7YR				* 33P VOL1PHCT1	00002817	03/08/78
SWFHOLHUM	21	71/7YR				* 58P VOL2 PHOT3	00002818	03/08/78
SWFHOLHUM	22	23/7YR				* 49P VOL2 PHOT2	00002819	03/08/78
SWFHOLHUM	23	20/7YR				* 49P VOL2 PHOT2	00002820	03/08/78
SWFHOLHUM	24	16/7YR				* 49P VOL2 PHOT2	00002821	03/08/78
SWFHOLHUM	25	20/7YR				* 58P VOL2 PHOT3	00002822	03/08/78
SWFHOLHUM	26	11/7YR				* 41P VOL1 PHOT1	00002823	03/08/78
SWFHOLHUM	27	102/7YR				* 33P VOL1 PHOT1	00002824	03/08/78
SWFHOLHUM	28	13/7YR				* 33P VOL1 PHOT1	00002825	03/08/78
SWFHOLHUM	29	6/7YR				* 41P VOL1 PHOT1	00002826	03/08/78
SWFHOLHUM	30	10/7YR				* 66P VOL2 PHOT3	00002827	03/08/78
SWFHOLHUM	31	12/7YR				* 33P VOL1 PHOT1	00002828	03/08/78
SWFHOLHUM	32	44/7YR				* 33P VOL1 PHOT1	00002829	03/08/78
SWFHOLHUM	33	20/7YR				* 66P VOL3 PHOT3	00002830	03/08/78
SWFHOLHUM	34	03/7YR				* 58P VOL2 PHOT2	00002831	03/08/78
SWFHOLHUM	35	63/7YR				* 58P VOL2 PHOT2	00002832	03/08/78
SWFHOLHUM	36	30/7YR				* 58P VOL2 PHOT2	00002833	03/08/78
SWFHOLHUM	37	30/7YR				* 53P VOL2 PHOT2	00002834	03/08/78
SWFHOLHUM	38	20/7YR				* 66P VOL3 PHOT3	00002835	03/08/78
SWFHOLHUM	39	5-2-7/7GM				* 30J DEFAULT	00002836	03/13/78
SWFHOLHUM	40	5-2-7/7GM				* 30J DEFAULT	00002837	03/13/78
SWFHOLHUM	41	5-2-7/7GM				* 30J DEFAULT	00002838	03/13/78
SWFHOLHUM	42	5-2-7/7GM				* 30J DEFAULT	00002839	03/13/78
SWFHOLHUM	43	5-2-7/7GM				* 30J DEFAULT	00002840	03/13/78
SWFHOLHUM	44	5-2-7/7GM				* 30J DEFAULT	00002841	03/13/78
SWFHOLHUM	45	5-2-7/7GM				* 30J DEFAULT	00002842	03/13/78
SWFHOLHUM	46	5-2-7/7GM				* 30J DEFAULT	00002843	03/13/78
SWFHOLHUM	47	5-2-7/7GM				* 30J DEFAULT	00002844	03/13/78
SWFHOLHUM	48	5-2-7/7GM				* 30J DEFAULT	00002845	03/13/78
SWFHOLHUM	49	5-2-7/7GM				* 30J DEFAULT	00002846	03/13/78
SWFHOLHUM	50	5-2-7/7GM				* 30J DEFAULT	00002847	03/13/78
SWFHOLHUM	51	5-2-7/7GM				* 30J DEFAULT	00002848	03/13/78
SWFHOLHUM	52	5-2-7/7GM				* 30J DEFAULT	00002849	03/13/78

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RUN NO.	6165	DATE	04/10/78	TIME	0950	LISTING OF MODULE TSTIB	03/13/78
S	TNRH2CCTR			5.2-7/GM	*	300 DEFAULT	00002850
S	ENRH2CCTR			5.2-7/GM	*	300 DEFAULT	00002851
S	3CBH2CCTR			5.2-7/GM	*	300 DEFAULT	00002852
S	0NAH2CCTR			5.2-7/GM	*	300 DEFAULT	00002853
S	3DPH2CCTR			5.2-7/GM	*	300 DEFAULT	00002854
S	5DPH2CCTR			5.2-7/GM	*	300 DEFAULT	00002855
S	4ADH2CCTR			5.2-7/GM	*	300 DEFAULT	00002856
S	3NDH2CCTR			5.2-7/GM	*	300 DEFAULT	00002857
S	0NPH2CCTR			5.2-7/GM	*	300 DEFAULT	00002858
S	2ADH2CCTR			5.2-7/GM	*	300 DEFAULT	00002859
S	4ADH2CCTR			5.2-7/GM	*	300 DEFAULT	00002860
S	4CBH2CCTR			5.2-7/GM	*	300 DEFAULT	00002861
S	AD9H2CCTR			5.2-7/GM	*	300 DEFAULT	00002862
S	TCLH2CCTR			5.2-7/GM	*	300 DEFAULT	00002863
S	2NTH2CCTR			5.2-7/GM	*	300 DEFAULT	00002864
S	4NTH2CCTR			5.2-7/GM	*	300 DEFAULT	00002865
S	23DH2CCTR			5.2-7/GM	*	300 DEFAULT	00002866
S	25DH2CCTR			5.2-7/GM	*	300 DEFAULT	00002867
S	34DH2CCTR			5.2-7/GM	*	300 DEFAULT	00002868
S	35DH2CCTR			5.2-7/GM	*	300 DEFAULT	00002869
S	T11H2CCTR			5.2-7/GM	*	300 DEFAULT	00002870
S	AN6H2CCTR			5.2-7/GM	*	300 DEFAULT	00002871
S	AN7H2CCTR			5.2-7/GM	*	300 DEFAULT	00002872
S	BADH2CCTR			5.2-7/GM	*	300 DEFAULT	00002873
S	ADCH2CCTR			5.2-7/GM	*	300 DEFAULT	00002874
S	ABOH2CCTR			5.2-7/GM	*	300 DEFAULT	00002875
S	TNRH2CCTR			5.2-7/GM	*	300 DEFAULT	00002876
S	3NBH2CCTR			5.2-7/GM	*	300 DEFAULT	00002877
S	0CBH2CCTR			5.2-7/GM	*	300 DEFAULT	00002878
S	0NAH2CCTR			5.2-7/GM	*	300 DEFAULT	00002879
S	3DPH2CCTR			5.2-7/GM	*	300 DEFAULT	00002880
S	5DPH2CCTR			5.2-7/GM	*	300 DEFAULT	00002881
S	4ADH2CCTR			5.2-7/GM	*	300 DEFAULT	00002882
S	3NDH2CCTR			5.2-7/GM	*	300 DEFAULT	00002883
S	0NPH2CCTR			5.2-7/GM	*	300 DEFAULT	00002884
S	2ADH2CCTR			5.2-7/GM	*	300 DEFAULT	00002885
S	4ADH2CCTR			5.2-7/GM	*	300 DEFAULT	00002886
S	4CBH2CCTR			5.2-7/GM	*	300 DEFAULT	00002887
S	AD9H2CCTR			5.2-7/GM	*	300 DEFAULT	00002888
F	26DHUM			.25	*	3.2	00002889
F	24DHUM			.25	*	3.2	00002890
F	2ADHUM			.25	*	3.2	00002891
F	TCPHUM			.25	*	3.2	00002892
F	TELHUM			.25	*	3.2	00002893
F	2NTHUM			.25	*	3.2	00002894
F	4NTHUM			.25	*	3.2	00002895
F	23DHUM			.25	*	3.2	00002896
F	25DHUM			.25	*	3.2	00002897
F	34DHUM			.25	*	3.2	00002898
F	35DHUM			.25	*	3.2	00002899
F	T11HUM			.25	*	3.2	00002900
F	AN6HUM			.25	*	3.2	00002901

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IN NO. & L&S	DATE	TIME	0950	LISTING OF MODULE	ISTIB	
R AN7HUM			.25	*	3-2	00003210
R AN8HUM			.25	*	3-2	00003211
R AC9HUM			.25	*	3-2	00003212
R AD0HUM			.25	*	3-2	00003213
R AD1HUM			.25	*	3-2	00003214
R AD2HUM			.25	*	3-2	00003215
R AD3HUM			.25	*	3-2	00003216
R AD4HUM			.25	*	3-2	00003217
R AD5HUM			.25	*	3-2	00003218
R AD6HUM			.25	*	3-2	00003219
R AD7HUM			.25	*	3-2	00003220
R AD8HUM			.25	*	3-2	00003221
R AD9HUM			.25	*	3-2	00003222
R AD0HUM			.25	*	3-2	00003223
R AD1HUM			.25	*	3-2	00003224
R AD2HUM			.25	*	3-2	00003225
R AD3HUM			.25	*	3-2	00003301
R AD4HUM			.25	*	3-2	00003626
R AD5HUM			.25	*	3-2	00003626

Populations, Flows and Travel Times

The line numbers corresponding to these variables are cataloged in Table 2. On each line is the variable, its qualifier subscripts, the variable value (best estimate) and its uncertainty assignment. Information following the uncertainty is either commentary or a document identifier.

TABLE 2. LINE NUMBERS FOR POPULATION DATA, FLOW RATES AND TRAVEL TIMES USED IN COMPUTATIONS

Group	Population Size	Flow Rate	Travel Time
Joliet Humans 1	830	2260	2080
Joliet Fish 1-3	831-833	2270-2290	2090-2110
Radford Humans 1	551	2180	2120
Radford Fish 1-4	610-613	2230-2233	2170-2173
Volunteer Humans 1-2	630-631	2300-2310	2480-2490
Volunteer Fish 1-4	671-674	2350-2380	2530-2560
Holston Humans 1-4	750-780	2580-2583	2400-2403
Holston Fish 1-3	800-802	2630-2632	2450-2452

Units of N are arbitrary, but must be unique for each population type. SMF may be expressed in either liter/year or ft^3/sec ($1 \text{ ft}^3/\text{sec} = 8.9 \times 10^8$ liter/year). SMT is usually expressed in days.

The actual situations represented by these variables are discussed below and schematically portrayed in Figures 2 through 5.

Joliet Army Ammunition Plant. TNT wastewaters flow to the Illinois River at the juncture of the Des Plaines and Kankakee Rivers. Three fish populations represent fish in three "pools," each formed behind a water regulation dam. Fish populations for this situation (and the others) were computed by methods described in reference 3. The human population represents Peoria, IL. The Illinois River is used as a portion of its water supply; the population size is prorated to reflect the percent of supply from the river.

Radford Army Ammunition Plant. TNT wastewaters flow to the New River. Fish in the New River are divided into four groups. The first three are

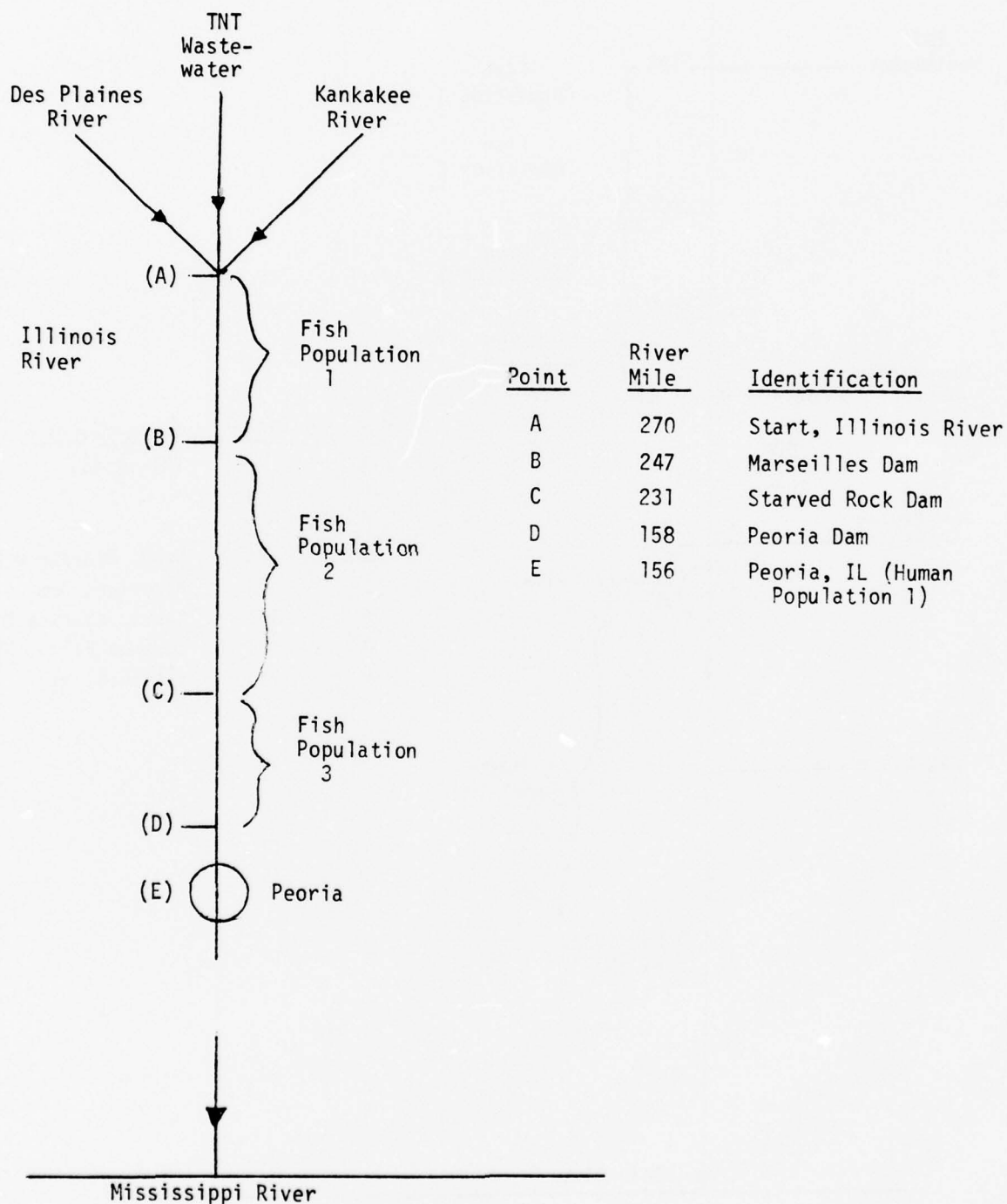


Figure 2. HRAM Representation of Populations at Risk from TNT Wastewaters of Joliet Army Ammunition Plant.

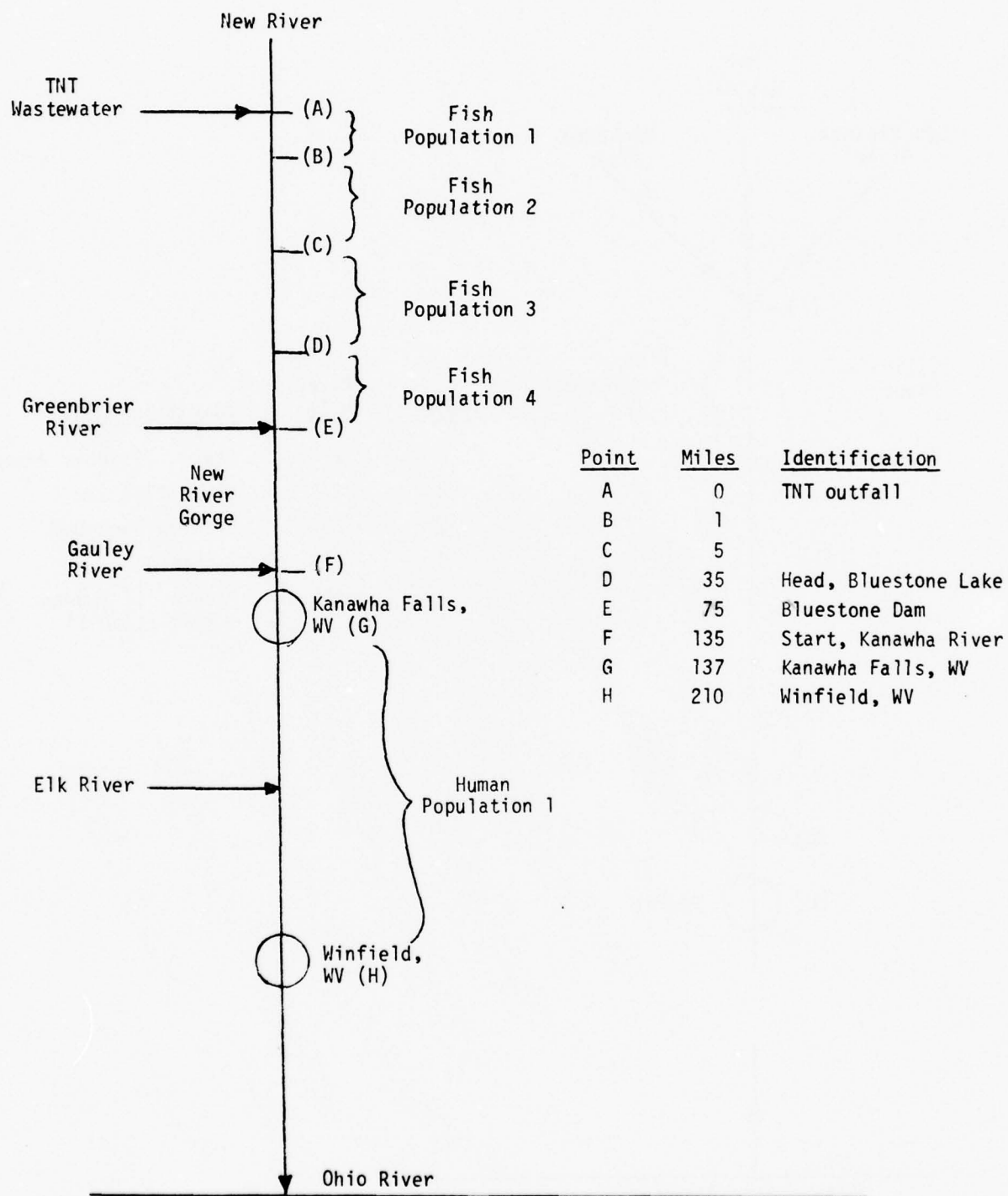


Figure 3. HRAM Representation of Populations at Risk from TNT Wastewaters of Radford Army Ammunition Plant.

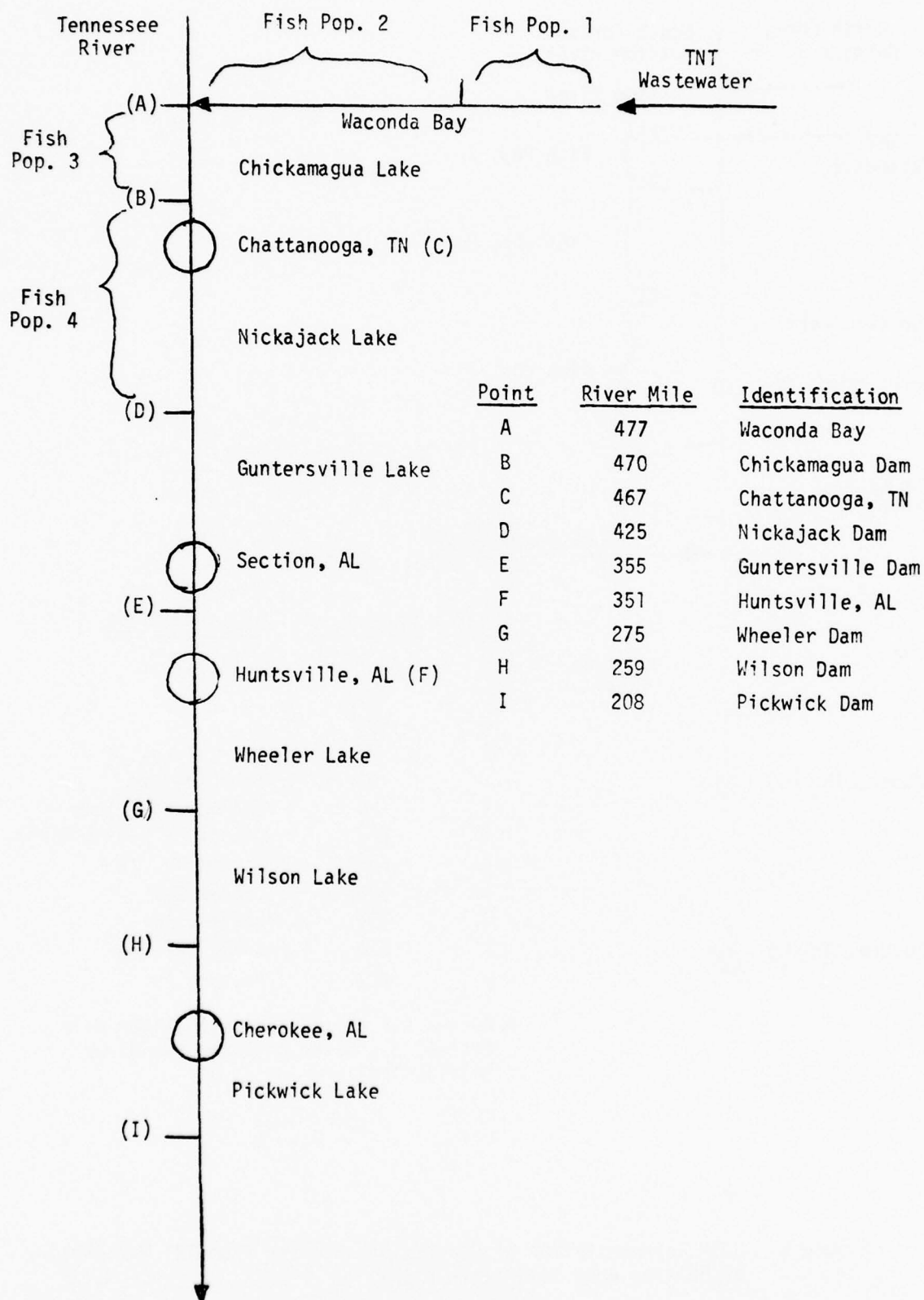


Figure 4. HRAM Representation of Populations at Risk from TNT Wastewaters of Volunteer Army Ammunition Plant.

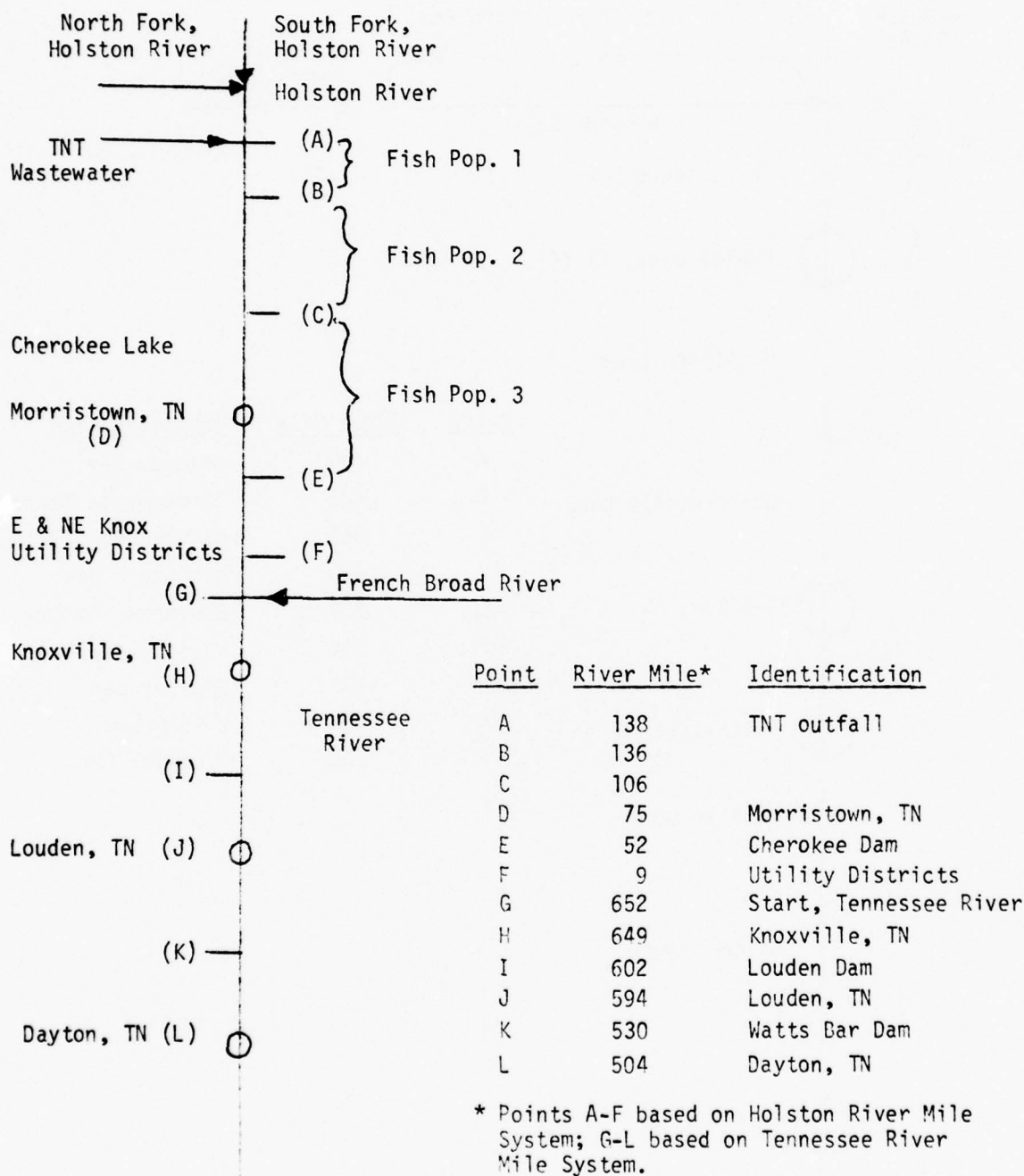


Figure 5. HRAM Representation of Populations at Risk from TNT Wastewaters of Holston Army Ammunition Plant.

based on arbitrary sections of the river, the last group inhabits Blue-stone Lake. From the town of Kanawha Falls, WV to Winfield, WV, several utilities serving 70,000 persons use the Kanawha River as their drinking water supply. For these populations, travel time estimates ranged from 4.7 to 6.9 days. To reduce the number of computations without seriously affecting accuracy, these communities were represented as one population group at 5.7 days travel time.

Volunteer Army Ammunition Plant. This is the most complicated and least accurately-defined situation, as reflected in the higher uncertainties assigned to flow and travel times. TNT wastewaters discharge to the head of Waconda Bay. The bay is a backwater of Chickamagua Lake, the reach of the Tennessee River behind the Chickamagua Dam. The only consistent flow to the bay is wastewater from Volunteer Army Ammunition Plant. Considerable time is expected for pollutants to traverse Waconda Bay, although it is only 2 miles long, and to mix with the main stem flow of the Tennessee River.

Two fish populations are specified for the bay. Flow rates are assumed as roughly 4 and 10 times wastewater flow respectively. Travel time is estimated on the basis of section of bay water capacity and flow rate. The fish in Chickamagua Lake below Waconda Bay are considered a third population; the fish in Nickajack Lake are considered a fourth population. The Tennessee River is the water supply source for several Tennessee and Alabama communities. Since the bulk of travel time is expected to occur from the wastewater outfall to Chickamagua Dam, these communities were represented by two population groups. The first represents communities from Chattanooga, TN to Section, AL. The second represents communities from Guntersville, AL to Cherokee, AL. Flow and travel time variables are keyed to the most populous communities in these groups, Chattanooga, TN (158,000 persons) and Huntsville, AL (146,000 persons) respectively.

Holston Army Ammunition Plant. The plant discharges wastewaters to the Holston River below the juncture of the North and South Forks, Holston River. Actual discharges are from several outfalls; for HRAM purposes they are represented as one outfall. The waters from the two forks are poorly mixed for a few miles downstream of their juncture. Hence, the first fish population is assumed to have a flow more representative of the North Fork than the whole river. Fish population 2 represents fish that would reside in the Holston River to the head of Cherokee Lake. The lake is expected to add considerable travel time. This is reflected in the SMT of fish population 3 and of the first human population, the city of Morristown, TN. Human population 2 represents two utility districts that draw water below Cherokee Dam. The city of Knoxville, TN draws water from the Tennessee River (which is considered to start at the juncture of the Holston and French Broad Rivers). The last human population represents smaller towns between Loudon and Dayton, TN.

Pollution Discharge Rates

Discharge rates to surface waters are at the following line number locations:

for Volunteer - 1730, 1760, 1800, 1831-1857, 2040

for Joliet - 1731, 1761, 1820, 1858-1884, 2041

for Radford - 1810 and 2050

for Holston - 2070

The discharges are based on full capacity operations at the plants. Extensive characterization of "condensate water" discharges has been accomplished for Volunteer Army Ammunition Plant from one 50 ton/day TNT production line. There are six such lines at the plant. On the basis of monthly discharge flow data,⁵ a full capacity discharge volume of 1.43×10^9 liter/year was adopted.[†]

Concentration data had to be critically reviewed, as the analytical method employed, gas chromatography, can mask the possible presence of some compounds by other compounds. With several compounds, only sporadic presence was observed. Accordingly, for compounds where masking was not expected, all analyses, including zeros, were used to compute an estimated mean concentration. For those compounds where masking was expected, the estimated mean was taken as one-half the average of non-zero analyses. The computed concentrations appear in Table 3. The discharge rates in Figure 1 are the products of the flow and concentrations, with proper unit adjustment.

Of note are the rather large percentages of the dinitrotoluenes, partially nitrated products in TNT production. Their higher concentration illustrates the distillation aspects of "condensate water." Similarly, 1,3-dinitrobenzene occurs in an unusually high percentage, although the precursor benzene is a trace impurity in reagent toluene. The amino-nitrotoluenes and amino-dinitrotoluenes would be expected from environmental reduction of the di- and trinitrotoluenes that survive the "sellite" process.

For discharges from Volunteer Army Ammunition Plant, an uncertainty of " * 3" was assigned to those compounds that were not masked in analysis. This reflected the variability of flow, concentration analysis and scale-up to full operating conditions. For compounds where masking was expected, an uncertainty of " * 5" was assigned. For discharges at

[†] In more typical units, 1.75 gallons of wastewater occur/lb of production grade TNT.

TABLE 3. COMPOUND CONCENTRATIONS USED FOR "CONDENSATE WATER"

Compound	Concentration, mg/liter	Remarks
Toluene	0.057	
2-Nitrotoluene	0.009	
4-Nitrotoluene	0.020	
3-Nitrobenzonitrile	0.001	
4-Nitrobenzonitrile	0.0004	
2-Amino-4-nitrotoluene	0.006	
2-Amino-6-nitrotoluene	0.017	Masked
3-Amino-4-nitrotoluene	0.001	
3-Methyl-2-nitrophenol	0.011	Masked
5-Methyl-2-nitrophenol	0.068	Masked
1,3-Dinitrobenzene	2.05	
2,3-Dinitrotoluene	0.198	Masked
2,4-Dinitrotoluene	7.26	
2,5-Dinitrotoluene	0.111	
2,6-Dinitrotoluene	3.55	
3,4-Dinitrotoluene	0.192	
3,5-Dinitrotoluene	0.180	
3,5-Dinitroaniline	0.004	
1,3,5-Trinitrobenzene	0.076	Masked
2,3,6-Trinitrotoluene	0.134	Masked
2,4,6-Trinitrotoluene	0.482	Masked
2-Amino-3,6-dinitrotoluene	0.002	
2-Amino-4,6-dinitrotoluene	0.012	Masked
3-Amino-2,4-dinitrotoluene	0.431	Masked
3-Amino-2,6-dinitrotoluene	0.288	Masked
4-Amino-2,6-dinitrotoluene	0.269	Masked
4-Amino-3,5-dinitrotoluene	0.062	
5-Amino-2,4-dinitrotoluene	0.549	
2,4-Dinitro-5-methylphenol	0.043	Masked
1,5-Dimethyl-2,4-dinitrotoluene	0.116	

Joliet Army Ammunition Plant, uncertainties of " * 5" and " * 7" were respectively assigned. These increased uncertainties account for extrapolations made between plants.

TNT discharges at Radford Army Ammunition Plant are two-thirds of the estimated discharges that existed prior to production stoppage due to an explosion. Three 50 ton/day lines then operated; two are to operate when production resumes.

Discharges of 2,4-dinitrotoluene at Radford Army Ammunition Plant are expected to be predominately associated with propellant production rather than with TNT production. Reduced TNT production is not expected to impact on the discharge rate.

TNT discharges from Holston Army Ammunition Plant are the least accurately defined. Plant data⁶ indicates discharge rates 10 times higher than used here, but in-river measurements⁷ indicate that much lower amounts are present in the Holston River.

Environmental Disappearance Rate Constants

Values of LMD are identified by line numbers 2660-2835. This factor tries to typify environmental processes that remove or destroy a compound in terms of first order kinetics. First order kinetics, at least over a short time scale, is a fair descriptor of certain environmental processes. Whether this is accurate over the travel times encountered in this HRAM analysis is not known.

For estimation purposes, several sets of test data or estimates were available from studies performed as part of SRI, International contract efforts. The "roof-top" test⁸ was considered the most reliable source of data. In this test, a compound was placed in aqueous solution in two open beakers. The beakers were placed on a roof-top, where they were exposed to diurnal conditions. However, one beaker was shaded. Both beaker contents were stirred. Evaporated water losses were replaced prior to withdrawing samples for analysis. By analysis, the loss of compound by combined photolysis and vaporization or by just vaporization could be measured. From the difference in pseudo-first order loss rates, the photolysis component could be estimated.

Table 4 identifies the compounds that were tested by this method. The results for 2,4-dinitrotoluene are presented in Figure 6 as an illustration. The pseudo-first order rate constant for the summed processes was computed as 49/year; and for the vaporization process, 21/year. Since rates are additive, the photolysis rate constant was estimated as 28/year.

TABLE 4. TESTS ON ENVIRONMENTAL EFFECTS FOR TNT WASTEWATER COMPOUNDS AND SELECTED RATE CONSTANTS

Compound	Roof-Top Test	Photolysis Reactor	Rate Constants, year ⁻¹	
			Vaporization	Photolysis
2-Nitrotoluene		X		
4-Nitrotoluene		X		
2,3-Dinitrotoluene	X		30	18
2,4-Dinitrotoluene	X		21	28
2,5-Dinitrotoluene	X		42	198
2,6-Dinitrotoluene	X		49	163
3,4-Dinitrotoluene	X		16	4
3,5-Dinitrotoluene	X		21	9
1,3-Dinitrobenzene	X		16	4
3-Methyl-2-nitrophenol		X		
5-Methyl-2-nitrophenol		X		
2-Amino-4-nitrotoluene		X		
2-Amino-6-nitrotoluene		X		
3-Amino-4-nitrotoluene		X		
3-Amino-2,4-dinitrotoluene	X		11	10
3-Amino-2,6-dinitrotoluene	X		20	220
4-Amino-3,5-dinitrotoluene	X		9	17
4-Amino-2,6-dinitrotoluene	X		6	183
5-Amino-2,4-dinitrotoluene	X		2	12
1,5-Dimethyl-2,4-dinitrotoluene	X		26	64

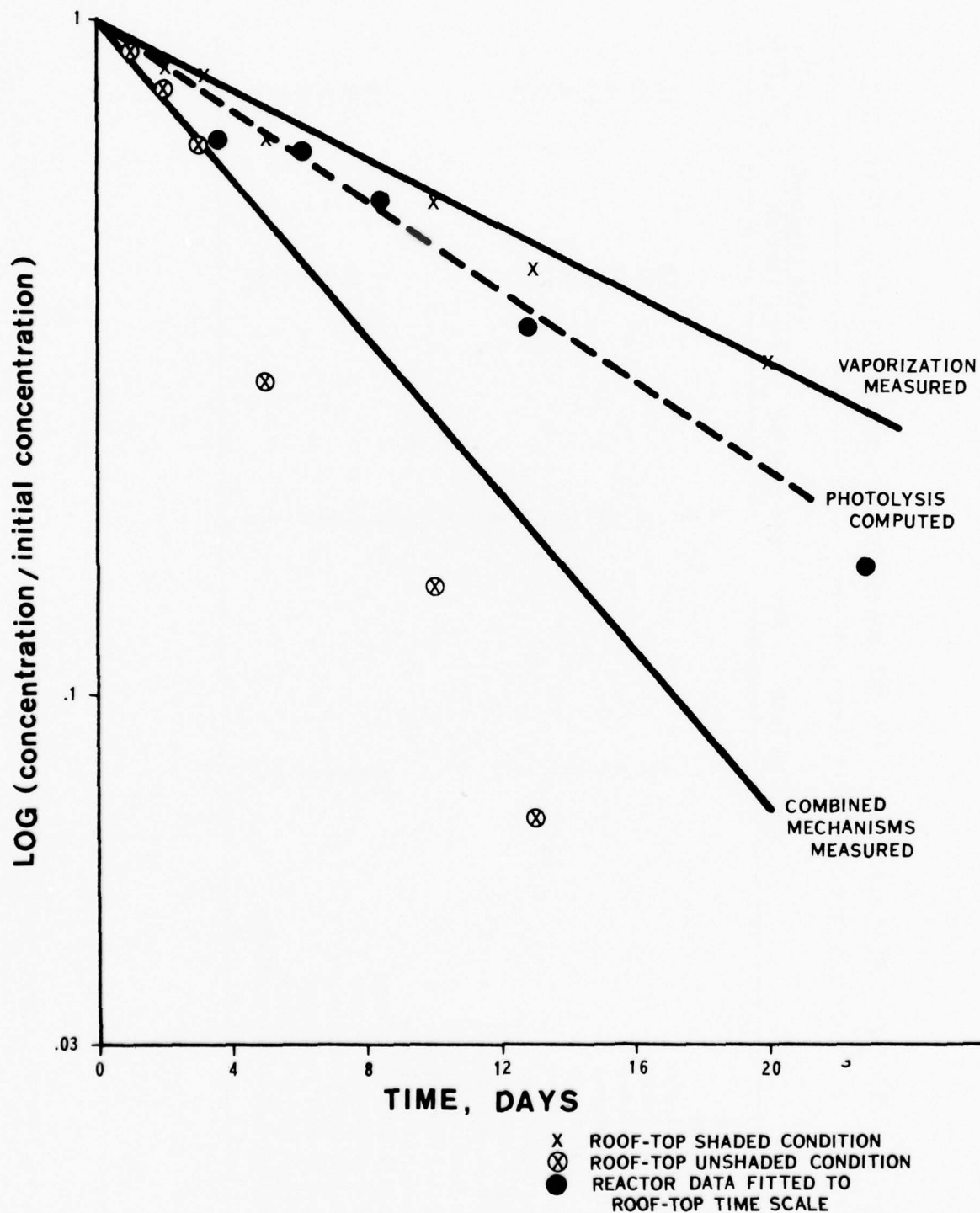


Figure 6. Roof-Top Test Data and Photolysis Reactor Time Estimates for 2,4-Dinitrotoluene.

LMD was then computed by the following assumed relation:

$$\text{LMD} = 2/3 (\text{vaporization rate constant}) + 2/5 (\text{photolysis rate constant}) \quad (6)$$

The fractions were applied to adjust for less effective sunlight or cooler average weather conditions in actual environments. The test was performed in Menlo Park, CA in the summer, during a period of clear, sunny days.

When not available from the "roof-top" test, photolysis data were derived from results of another test apparatus, the flow-through photolysis reactor.⁸ The aqueous solution flowed through a glass coil. A tubular irradiation light was placed along the coil axis. The arrangement was placed in a thermostatically controlled water bath. Flow rate through the coil, and hence exposure time, was controlled.

For reactor results to provide constants comparable to those from the "roof-top" test, common 2,4-dinitrotoluene test results were used for adjustment. Figure 6 shows these results superimposed along the estimated photolysis curve. Most other compounds that had been tested both ways agreed reasonably well with this adjustment of time. Table 4 also indicates the compounds analyzed with the reactor. The photolysis data used are in reference 9.

For other vaporization rate constants, Spanggord¹⁰ provided rough estimates based on gas-chromatograph retention times. These were converted to rate constants on the basis of a side-by-side comparison of those compounds for which both "roof-top" and gas chromatograph data were provided.

For toluene, the methyl-nitrophenols, the nitrobenzonitriles and 1,3,5-trinitrobenzene, photolysis was considered unimportant in computing LMD. For TNT and 2,3,6-trinitrotoluene, vaporization was considered unimportant. Moreover, photolysis rates equal to that of 2,6-dinitrotoluene were adopted, based on a suggestion by Barkley.¹¹ For any remaining compounds, a default LMD of 20/year was used.

Table 4 shows vaporization and photolysis rate constants for several compounds. The striking feature is the wide range of photolysis constants within an isomeric group. From structural considerations, the 2,6-dinitro configuration promotes photolytic degradation. However, other generalizations are not apparent.

Uncertainty assignments for these LMD were an involved process. The term $\exp(-\text{LMD} * \text{SMT})$ poses a problem to the assumption of log-normal hazard. If LMD is assumed log-normal, and the uncertainty contribution from SMT of minor importance, the stochastically-computed hazard consistently underestimates the deterministically-computed hazard. The larger

the uncertainty, the larger the skew. Use of a percentage uncertainty for LMD was found to largely avoid this bias.

An ad hoc method of quantifying uncertainty had to be developed. Consideration was given to the 95 percent range expected to exist for $\exp(-LMD * SMT) = 0.001$. For LMD data considered the most accurate (a roof-top test with good agreement with reactor results), a 100-fold range was assumed due to LMD uncertainty. From this, an uncertainty of "+ 33 P" was calculated. For the poorest quality LMD data (default), the range was assumed to be 10,000-fold. This corresponded to an uncertainty of "+ 66 P." Other percentages were intermediate based on the quality of the data sources.

Retention Factors

These factors are listed on line numbers 3090-3301. All values are set to 0.25 with an uncertainty of " * 3.2." Compounds in the environment, even at concentrations below their aqueous solubility, do not exist solely in solution. They would be adsorbed on living or mineral particulate matter in river or lake water. Water treatment processes remove such matter, reducing the amount of compound available for human ingestion. The value 0.25 is considered typical of such treatment processes.

Concentration-Dose Conversion Factors

Values of SMB for chronic human dosing is 500 liter/year, representative of a yearly level of consumption. The dose-risk slopes for several chronic effects from several compounds (line numbers 2836-2889) have the SMB factor incorporated in cgs units, 0.0159 cc/sec. Since this factor is assumed invariant, this is allowable.

Effects and Values

Five effects are considered in this study. Effects to humans are considered only from chronic dosing. The effects are:

1. Some mutagenic or carcinogenic response in humans (C). This is valued at \$300,000 per occurrence.
2. Some severe non-mutagenic or non-carcinogenic effect in humans (CTG). This could mean outright death or other response that would be considered of socioeconomic equivalent. This is also valued at \$300,000 per occurrence.
3. Some mild response in humans (CTR). This would be equivalent to toxic responses that are noted in long-term studies in mammals where CTG-type effects are not observed. This is valued at \$30,000 per occurrence.

4. Fish kill due to acute exposure (FKL). This is an episodic effect expected to occur once yearly during a period of low flow. This is valued at \$1.00 per fish killed. This is derived on a per weight basis.

5. Chronic fish effect (CFS). This is an effect manifested due to continual contact with a pollutant in water. Some examples would be loss of reproductive ability, death or tainted flesh. This is also valued at \$1.00 per affected fish.

These effects are purposely vague. When detailed data is not available about compounds, it is difficult to predict specific effects. Moreover, different compounds will manifest different effects which are of equivalent adverse value.

Dose-Risk Slopes

Fish Effects. Line number locations for these data are as follows:

<u>Compound</u>	
2,4,6-trinitrotoluene	1200, 1207
2,4-dinitrotoluene	1253, 1256
2,6-dinitrotoluene	1322, 1327
2-amino-4,6-dinitrotoluene	1291, 1292
4-amino-2,6-dinitrotoluene	1281, 1282
All other compounds	1330-1390

The valuations are based on bioassay screening tests performed by SRI, International and summarized in reference 12. The lower of either the 48-hour EC50 to *Daphnia*[†] or the 96-hour LC50^{††} to a fish species was the basis for slope determination. The slopes and uncertainty assignments were determined as described in reference 3:

$$S(\text{FKL}) = 0.1/\text{LC50 (or EC50)}, \text{uncertainty} = * 4 \quad (7)$$

$$S(\text{CFS}) = 3 * S(\text{FKL}), \text{uncertainty} = * 15 \quad (8)$$

The notation S(mnemonic of effect) will be used as a shorthand notation in subsequent sections of this report.

[†] This is the statistically computed concentration of that which will cause death (or the observable equivalent) to 50 percent of *Daphnia* after 48 hours exposure.

^{††} This is the statistically computed concentration of that which will cause death to 50 percent of fish after 96 hours exposure.

Human Effects. Line number locations for these dose-risk slopes are cataloged in Table 5. For the carcinogenesis effect, the value for 2,4-dinitrotoluene is based on results of a 2-year mammalian (rats) study by Ellis, *et al.*¹³ Tumors were not observed in test animals which had been dosed with 5 mg/kg/day or less of 2,4-dinitrotoluene. This was the first data available based on such a study. Conversion to HRAM format was based on an adaptation of a method reported by Hoel, *et al.*¹⁴ First, an adjusted human equivalent dose (AHED) is computed.

$$\text{AHED} = \text{Animal dose} * (\text{Human weight/animal weight})^{2/3} \quad (9)$$

For 0.4 kg rats and 60 kg humans, a dose of 140 mg/day or 51 g/year is computed.

TABLE 5. DOSE-RISK SLOPE DATA LINE NUMBER LOCATIONS

Compound	S(C)	S(CTR)	S(CTG)
2,4,6-Trinitrotoluene	1180	1203	1205
2,4-Dinitrotoluene	1250	1254	1252
4-Amino-2,6-dinitrotoluene	1280	(see below, other compounds)	
2-Amino-4,6-dinitrotoluene	1290	(see below, other compounds)	
2,6-Dinitrotoluene	1320	1324	1321
"Condensate water"	1360	1362	1361
Other compounds	1461-1485	2836-2862	2863-2889

Given the number of animals tested, determine an upper 95 percent confidence limit on the range of the "true" risk at the highest observed "no-effect" level. This is a consequence of binomial distribution statistical arguments; tables and graphs are available for this purpose. For 120 test animals, this limit is 0.04.

The log-normal uncertainty is chosen that would be applicable to the data at the current state of knowledge. The confidence limit determined above is divided by this uncertainty. In this case, an uncertainty of " * 10" is chosen, which is somewhat higher than that which would be assigned if the test had involved two mammalian species (see Research Projects, page 46). This value is 0.004.

The dose-risk slope is that of the line that passes through the dose-risk origin and the point (AHED, upper 95 percent confidence limit/uncertainty). In this case, the result is 0.004/5l or 8×10^{-5} /gram.

All other compounds except "condensate water" have been processed through an Ames/Salmonella mutagenic bioassay by SRI, International. This bioassay determined the mutagenic activity of compounds to five mutant strains of Salmonella typhimurium: TA 1535, TA 1537, TA 1538, TA 98 and TA 100, in the presence and absence of a rat-liver activation system. These bacteria are not expected to survive in the nutrient medium supplied (with compound addition) unless they revert to a normal state through mutation. Some do revert without any compound addition; this condition serves as the bioassay control. If increasing amounts of a compound cause an increasing number of reversions, the compound is deemed to have mutagenic potential. If this occurs with the activation system, metabolites of the compound have mutagenic potential. If the compound fails to cause significant reversions with all strains with and without activation, the compound may not be mutagenic.

The results of these bioassays have been reported in reference 8. The investigators also determined a potency factor, which is the maximum number of revertants/microgram of compound for the most pronounced strain-activation situation. A maximum exists because a compound, above a certain mass level on a plate, becomes toxic. These potency factors have also been reported.⁸

The potency factor has not been accepted by the scientific community as immediately translatable to a mammalian system. However, it did appear worthy of some weighting since a life system was involved and 2,4-dinitrotoluene, for which more detailed testing had been done, was also processed through the bioassay. Accordingly, the following relation was used to compute S(C) for compounds with mutagenic potential:

$$S(C) = 8 * 10^{-5} (\text{potency of compound/potency of 2,4dinitrotoluene})^{2/3} \quad (10)$$

An uncertainty of " * 20" was assigned to all such S(C).

The compounds observed not to have mutagenic potential were toluene, 2-nitrotoluene, and the methyl-nitrophenols. Since the bioassay is not a perfect predictor, some probability exists that they may have mutagenic potential. The values adopted for their S(C) were based on "activity tree" procedures described in reference 3. An uncertainty of " * 20" was also assigned. The estimated S(C) for "condensate water" was determined on contributions from its major constituent on the basis of concentration.

Estimates of S(CTR) and S(CTG) had been previously determined for TNT, 2,4-dinitrotoluene and 2,6-dinitrotoluene. Estimates for "condensate

water" were made on the basis of these, adjusted for concentration contributions. Somewhat higher uncertainties were assigned to S(CTG) and S(CTR) for "condensate water" than for the other three compounds. For all other compounds, the default slopes and corresponding uncertainties suggested in reference 3 were used. These slopes are: $S(CTR) = 3.3 \times 10^{-5}/\text{gram}$ and $S(CTG) = 3.3 \times 10^{-6}/\text{gram}$. The SMB has been incorporated into these values in the data base.

HAZARD ANALYSIS AND DISCUSSION

The data base of Figure 1 was processed to compute hazard. This was done in part to present such data for the meeting, and to determine which research projects to consider in the allocation analysis. The same program is used for hazard and allocation. For hazard, the data inputs are altered as follows:

- a. All uncertainties are reset to near certain levels (* 1.001).
- b. One research project is inserted which forces reevaluation of all hazards computed by Equation (2). The section on Research Projects discusses this in more detail.
- c. Two Monte-Carlo simulations are performed.

A portion of the print-out is shown in Figure 7,[†] which shows the data and computations corresponding to Equation (2). These hazards can be summed by location and population subgroup to indicate the hazards computed in Equation (3). Table 6 is the hazard summary for those compounds with hazards of 100 or greater. Other compounds with hazards of one or greater were:

3-amino-2,4-dinitrotoluene	91
2-amino-4,6-dinitrotoluene	42
2,5-dinitrotoluene	41
4-amino-2,6-dinitrotoluene	34
3-amino-2,6-dinitrotoluene	32
3,5-dinitrotoluene	16
2,4-dinitro-5-methylphenol	16
1,5-dimethyl-2,4-dinitrotoluene	14
3,5-dinitroaniline	14
4-amino-3,5-dinitrotoluene	7
2-amino-3,6-dinitrotoluene	3

[†] Prior to the run, it was anticipated that human effect's hazards would be numerically low. To improve precision, execution was accomplished with an (R) of 2.5 for humans. Figure 7 shows the print-out under this condition.

HAZARD DETAIL FOR TSTIB
SAMPLE NUMBER 2

1.001

SUBSEQ.TO PROGRAM #	CHM	LOC	MED	POP SUB LOC EFF	HAZARD \$/YEAR	VALUES IN CGS UNITS					B	RISK	
						DOSE	POP	V	S	SMB			
0	TCP	VOL	H2O	HUM	1 CTR	5.	0.36E-12	0.30E 06	0.30E 05	0.50E-04	0.16E-01	0.0	0.571E-09
0	TCP	VOL	H2O	HUM	1 CTG	5.	0.36E-12	0.30E 06	0.30E 06	0.50E-05	0.16E-01	0.0	0.571E-10
0	TCP	VOL	H2O	HUM	1 C	103.	0.36E-12	0.30E 06	0.30E 06	0.10E-03	0.16E-01	0.0	0.114E-08
0	TCP	VOL	H2O	HUM	2 CTR	1.	0.70E-13	0.22E 06	0.30E 05	0.50E-04	0.16E-01	0.0	0.110E-09
0	TCP	VOL	H2O	HUM	2 CTG	1.	0.70E-13	0.22E 06	0.30E 06	0.50E-05	0.16E-01	0.0	0.110E-10
0	TCP	VOL	H2O	HUM	2 C	15.	0.70E-13	0.22E 06	0.30E 06	0.10E-03	0.16E-01	0.0	0.220E-05
0	TCP	VOL	H2O	FSH	1 CFS	48.	0.29E-06	0.39E 04	0.10E 01	0.13E-02	0.10E 01	0.0	0.123E-01
0	TCP	VOL	H2O	FSH	1 FKL	16.	0.29E-06	0.39E 04	0.10E 01	0.44E-03	0.10E 01	0.0	0.408E-02
0	TCP	VOL	H2O	FSH	2 CFS	78.	0.56E-07	0.33E 05	0.10E 01	0.13E-02	0.10E 01	0.0	0.237E-02
0	TCP	VOL	H2O	FSH	2 FKL	26.	0.56E-07	0.33E 05	0.10E 01	0.44E-03	0.10E 01	0.0	0.789E-03
0	TCP	VOL	H2O	FSH	3 CFS	7.	0.19E-09	0.90E 06	0.10E 01	0.13E-02	0.10E 01	0.0	0.814E-05
0	TCP	VOL	H2O	FSH	3 FKL	2.	0.19E-09	0.90E 06	0.10E 01	0.44E-03	0.10E 01	0.0	0.271E-05
0	TCP	VOL	H2O	FSH	4 CFS	5.	0.50E-10	0.25E 07	0.10E 01	0.13E-02	0.10E 01	0.0	0.209E-05
0	TCP	VOL	H2O	FSH	4 FKL	2.	0.50E-10	0.25E 07	0.10E 01	0.44E-03	0.10E 01	0.0	0.695E-06
0	TCP	VOL	H2O	HUM	1 CTR	71.	0.36E-10	0.42E 05	0.30E 05	0.50E-04	0.16E-01	0.0	0.561E-07
0	TCP	VOL	H2O	HUM	1 CTG	71.	0.36E-10	0.42E 05	0.30E 06	0.50E-05	0.16E-01	0.0	0.561E-08
0	TCP	VOL	H2O	HUM	1 C	1414.	0.36E-10	0.42E 05	0.30E 06	0.10E-03	0.16E-01	0.0	0.112E-06
0	TCP	VOL	H2O	FSH	1 CFS	381.	0.70E-08	0.13E 07	0.10E 01	0.13E-02	0.10E 01	0.0	0.293E-03
0	TCP	VOL	H2O	FSH	1 FKL	127.	0.70E-08	0.13E 07	0.10E 01	0.44E-03	0.10E 01	0.0	0.576E-04
0	TCP	VOL	H2O	FSH	2 CFS	309.	0.53E-08	0.14E 07	0.10E 01	0.13E-02	0.10E 01	0.0	0.221E-03
0	TCP	VOL	H2O	FSH	2 FKL	103.	0.53E-08	0.14E 07	0.10E 01	0.44E-03	0.10E 01	0.0	0.736E-04
0	TCP	VOL	H2O	FSH	3 CFS	800.	0.33E-08	0.57E 07	0.10E 01	0.13E-02	0.10E 01	0.0	0.140E-03
0	TCP	VOL	H2O	FSH	3 FKL	267.	0.33E-08	0.57E 07	0.10E 01	0.44E-03	0.10E 01	0.0	0.468E-04
0	26D	VOL	H2O	HUM	1 CTR	0.	0.10E-15	0.30E 06	0.30E 05	0.11E-03	0.16E-01	0.0	0.347E-12
0	26D	VOL	H2O	HUM	1 CTG	0.	0.10E-15	0.30E 06	0.30E 06	0.45E-05	0.16E-01	0.0	0.142E-13
0	26D	VOL	H2O	HUM	1 C	0.	0.10E-15	0.30E 06	0.30E 06	0.70E-04	0.16E-01	0.0	0.221E-12
0	26D	VOL	H2O	HUM	2 CTR	0.	0.19E-17	0.22E 06	0.30E 05	0.11E-03	0.16E-01	0.0	0.668E-14
0	26D	VOL	H2O	HUM	2 CTG	0.	0.19E-17	0.22E 06	0.30E 06	0.45E-05	0.16E-01	0.0	0.273E-15
0	26D	VOL	H2O	HUM	2 C	0.	0.19E-17	0.22E 06	0.30E 06	0.70E-04	0.16E-01	0.0	0.425E-14
0	26D	VOL	H2O	FSH	1 CFS	2.	0.41E-07	0.39E 04	0.10E 01	0.48E-03	0.10E 01	0.0	0.620E-03
0	26D	VOL	H2O	FSH	1 FKL	1.	0.41E-07	0.39E 04	0.10E 01	0.16E-03	0.10E 01	0.0	0.207E-03
0	26D	VOL	H2O	FSH	2 CFS	1.	0.25E-08	0.33E 05	0.10E 01	0.48E-03	0.10E 01	0.0	0.379E-04
0	26D	VOL	H2O	FSH	2 FKL	0.	0.25E-08	0.33E 05	0.10E 01	0.16E-03	0.10E 01	0.0	0.127E-04
0	26D	VOL	H2O	FSH	3 CFS	0.	0.33E-12	0.90E 06	0.10E 01	0.48E-03	0.10E 01	0.0	0.489E-08
0	26D	VOL	H2O	FSH	3 FKL	0.	0.33E-12	0.90E 06	0.10E 01	0.16E-03	0.10E 01	0.0	0.163E-08
0	26D	VOL	H2O	FSH	4 CFS	0.	0.16E-13	0.25E 07	0.10E 01	0.48E-03	0.10E 01	0.0	0.242E-05
0	26D	VOL	H2O	FSH	4 FKL	0.	0.16E-13	0.25E 07	0.10E 01	0.16E-03	0.10E 01	0.0	0.806E-10
0	26D	VOL	H2O	HUM	1 CTR	13.	0.30E-11	0.42E 05	0.30E 05	0.11E-03	0.16E-01	0.0	0.102E-07
0	26D	VOL	H2O	HUM	1 CTG	5.	0.29E-11	0.42E 05	0.30E 06	0.45E-05	0.16E-01	0.0	0.419E-09
0	26D	VOL	H2O	HUM	1 C	82.	0.29E-11	0.42E 05	0.30E 06	0.70E-04	0.16E-01	0.0	0.652E-08
0	26D	VOL	H2O	FSH	1 CFS	27.	0.14E-08	0.13E 07	0.10E 01	0.48E-03	0.10E 01	0.0	0.207E-04
0	26D	VOL	H2O	FSH	1 FKL	9.	0.14E-08	0.13E 07	0.10E 01	0.16E-03	0.10E 01	0.0	0.690E-05
0	26D	VOL	H2O	FSH	2 CFS	16.	0.76E-09	0.14E 07	0.10E 01	0.48E-03	0.10E 01	0.0	0.114E-04
0	26D	VOL	H2O	FSH	2 FKL	5.	0.76E-09	0.14E 07	0.10E 01	0.16E-03	0.10E 01	0.0	0.381E-05
0	26D	VOL	H2O	FSH	3 CFS	24.	0.29E-09	0.57E 07	0.10E 01	0.48E-03	0.10E 01	0.0	0.429E-05
0	26D	VOL	H2O	FSH	3 FKL	8.	0.29E-09	0.57E 07	0.10E 01	0.16E-03	0.10E 01	0.0	0.143E-05
0	24D	VOL	H2O	HUM	1 CTR	40.	0.70E-12	0.30E 06	0.30E 05	0.20E-03	0.16E-01	0.0	0.445E-08
0	24D	VOL	H2O	HUM	1 CTG	6.	0.70E-12	0.30E 06	0.30E 06	0.30E-05	0.16E-01	0.0	0.667E-10
0	24D	VOL	H2O	HUM	1 C	160.	0.71E-12	0.30E 06	0.30E 06	0.80E-04	0.16E-01	0.0	0.178E-08
0	24D	VOL	H2O	HUM	2 CTR	9.	0.22E-12	0.22E 06	0.30E 05	0.20E-03	0.16E-01	0.0	0.141E-08
0	24D	VOL	H2O	HUM	2 CTG	1.	0.22E-12	0.22E 06	0.30E 06	0.30E-03	0.16E-01	0.0	0.211E-10
0	24D	VOL	H2O	HUM	2 C	38.	0.22E-12	0.22E 06	0.30E 06	0.80E-04	0.16E-01	0.0	0.564E-05

Figure 7. Hazard Computations Corresponding to Equation (2).

TABLE 6. HAZARD BY COMPOUND AND EFFECT (PARTIAL LIST)

Compound	Human Effects		Human Total	Fish Effects CFS + FKL	Total for Compound
	CIR + CTG	C			
"Condensate water"	16	153	169	2173	2342
2,4,6-Trinitrotoluene (all)	100	594	694	2333	3027
2,4,6-Trinitrotoluene (in condensate water)	2	14	16	132	148
2,3,6-Trinitrotoluene	1	12	12	766	778
2,4-Dinitrotoluene (all)	39	145	184	332	516
2,4-Dinitrotoluene (in condensate water)	25	84	109	279	388
1,3-Dinitrobenzene	4	82	86	410	496
5-Amino-2,4-dinitrotoluene	2	19	21	467	488
3,4-Dinitrotoluene	>1	5	5	185	190
1,3,5-Trinitrobenzene	>1	31	31	113	144
2,3-Dinitrotoluene	>1	4	4	122	126
2,6-Dinitrotoluene	2	8	10	93	103

The print-out in Figure 7 also shows risk, which in terms of variable notation is:

$$\text{Risk} = C * S * \text{SMB} \quad (11)$$

Hazard ranking is indifferent to situations of high risk-low population as opposed to low risk-high population. An allocator may have more interest in the former situation.

Fish risks are highest for Volunteer fish population 1, which is not surprising, given its travel time and flow variables. However, the larger-sized fish populations assigned at Joliet cause that plant to contribute the greatest increment to hazard. Conversely, for humans, the greatest risk is at Joliet, but due to population size, the greatest hazard increment is from Volunteer.

Table 7 is a partial listing of computed risks, taken for the most exposed population. The correspondence between these risks and hazards in Table 6 is not perfect. For example, the hazard of 1,3,5-trinitrobenzene to fish is higher than that of 2,6-dinitrotoluene. Yet, the risk of the most exposed fish group to 1,3,5-trinitrobenzene is lower than that to 2,6-dinitrotoluene. This apparent anomaly is due to the different LMD. The 1,3,5-trinitrobenzene is more persistent. Hence, it poses a lower risk to fish populations at small travel times, but would pose a relatively higher risk to fish populations at more distant travel times.

The sensitivity of hazard values to LMD is illustrated by a hypothetical example. The data base is in Table 8. All information required for Equation (2) is included with the exception of LMD. Table 9 presents the computed hazards with this data and different values of LMD. The greatest changes occur with the most time-distant populations, which would be expected from the exponential term. While the example is contrived, it does illustrate some important features of the TNT wastewater situation. Populations are located at travel times that are relatively short and long. Thus LMD assignment, barring gross mismatches, is probably not a decisive factor in the sensitivity of hazard results. The example shows that such a conclusion is a function of the demographic features of the situation.

The hazard results consistently show that the hazard to fish would be of more concern than to humans. Given the time-distance and size of fish populations, this is not totally unexpected. The vulnerability of fish as compared to humans, as seen in Table 7, overshadows the larger premium that is placed on human effects. This is indicative of a trend noted with compounds that have undergone extensive toxicological testing and for which some recommendations for standards have been prepared; the aquatic toxicology has been the most stringent criterion.

TABLE 7. RISKS ASSOCIATED WITH COMPOUNDS FOR THE MOST EXPOSED POPULATIONS (PARTIAL LIST)

Compound	Human Effects		Fish Effect CFS
	CTG	C	
"Condensate Water"	5.6×10^{-10}	1.1×10^{-8}	1.1×10^{-2}
2,4,6-Trinitrotoluene ^a	2.3×10^{-9}	2.8×10^{-8}	1.3×10^{-2}
2,3,6-Trinitrotoluene	1.8×10^{-12}	9.4×10^{-10}	4.8×10^{-3}
2,4-Dinitrotoluene	1.9×10^{-10}	5.1×10^{-9}	1.5×10^{-3}
1,3-Dinitrobenzene	7.6×10^{-11}	3.5×10^{-9}	1.9×10^{-3}
5-Amino-2,4-dinitrotoluene	2.3×10^{-11}	6.0×10^{-10}	1.6×10^{-3}
3,4-Dinitrotoluene	7.0×10^{-12}	1.7×10^{-10}	8.9×10^{-4}
1,3,5-Trinitrobenzene	3.0×10^{-12}	1.0×10^{-9}	5.3×10^{-4}
2,3-Dinitrotoluene	5.6×10^{-12}	2.4×10^{-10}	6.5×10^{-4}
2,6-Dinitrotoluene	4.1×10^{-11}	6.5×10^{-10}	6.2×10^{-4}

a. Maximum human risk at Radford Army Ammunition Plant; maximum fish risk at Holston Army Ammunition Plant.

TABLE 8. HYPOTHETICAL DATA BASE TO ILLUSTRATE SENSITIVITY
OF HAZARD TO LMD

Population Data, Flow Rates, and Travel Times			
	<u>Size</u>	<u>Flow Rate (liter/year)</u>	<u>Travel Time (days)</u>
Human 1	50,000	3×10^{12}	3
Human 2	250,000	1×10^{13}	40
Fish 1	20,000	1×10^{10}	1
Fish 2	5×10^6	5×10^{12}	25

Discharge rate - 20,000 kg/year

Effects Data	
<u>Effect</u>	<u>Slope</u>
CTR	8×10^{-5} /gram
CTG	5×10^{-6} /gram
C	2×10^{-4} /gram
CFS	0.33 liter/mg-year
FKL	0.10 liter/mg-year

Values, water treatment retention, and concentration-dose conversion factors are the same as in analysis.

TABLE 9. HAZARDS FROM TABLE 8 DATA BASED ON DIFFERENT VALUES OF LMD

	Hazard for Specified LMD			
	LMD=10	LMD=20	LMD=50	LMD=100
<u>Humans</u>				
Population 1	2453	2259	1765	1170
Population 2	1334	446	17	0
Total	3787	2705	1782	1170
<u>Fish</u>				
Population 1	16851	16397	15103	13169
Population 2	4365	2201	282	9
Total	21216	18598	15385	13178
Grand Total	25003	21303	17167	14348

Another consistent result is that the mutagenic potential predominates over other chronic effects in humans. This may be an artifact, in that very different approaches are taken to develop dose-risk slope values for these effects.

Tables 6 and 9 have neglected to show the units of hazard, nominally in dollars/year. This is deliberate. There is a tendency to take dollar amounts at face value or to misinterpret them. The reader is reminded that most of the concepts used in data base preparation are untested and quite empirical.

THE ALLOCATION ANALYSIS

Research Projects

Based on the computed hazards, a truncated set of research projects were selected for allocation analysis; they appear in Figure 8. The compounds are those with hazards of 100 or greater. With the exception of TNT, 2,4-dinitrotoluene, 2,6-dinitrotoluene, and condensate water, all compounds had the same demographic factors (N, SMF, SMT) and the same uncertainty assignments for dose-risk slopes. Thus, by comparison through hazard, the allocation objective factors for the other compounds could be inferred.

Each line entry consists of:

- a. The mnemonic code "PRO"
- b. A three character mnemonic of the project title.
- c. The variable whose uncertainty is to be reduced.

d. The variable subscripts. These are supplied in fixed order. Some latitude is available in their use. The most restrictive approach would be the subscripts associated with the variable in the data base. The notation "XXX" or "ALL" is used to signify that a variable is not applicable or is not a restriction. Thus, the first project shown in Figure 8 causes all contributions to hazard that include any variable N to be computed. This is, of course, what is desired to produce the hazard ranking.

e. The research cost.

f. The expected uncertainty after the research project is done.

g. Space to describe the project or documentary information. This is for user convenience.

Project "AAT" is an acute toxicity test for aquatic species. It includes more species, duration of tests, effects observed, and animal physiology than in the completed screening studies. The project is expected to cost \$20,000 per compound. It is expected to reduce the uncertainties associated with S(CFS) and S(FKL). Project "LTM" involves a detailed 2-year chronic feeding study of several mammalian species. Intensive pathology and physiology is performed, with special attention to the incidence of tumors or other abnormalities that could be considered precursors of carcinogenicity. The project is expected to cost \$400,000 per compound. It is expected to reduce the uncertainties associated with S(CTR), S(CTG) and S(C).

A project "LTM" for 2,4-dinitrotoluene was not included, as such a study has been completed. A "LTM" project is underway with TNT, but since the data base is "pre-LTM," the project was included for post-decision analysis.

Statistical Considerations of the Allocation Methodology

The next section will review in some detail the aspects of the generation, assembly and interpretation of objective factor results. As this is the first full exercise of HRAM, these facets are of interest. There are aspects of the analysis which may be more artifacts of the algorithms rather than valid conclusions. There may be pitfalls to placing too much reliance on a set of objective factor results.

RUN NO.	5591	DATE	03/17/78	TIME	1539	LISTING OF MODULE PROIB	
DESCRIPTION		* PROGRAM CATALOGUE FOR HRAM					
MASTER FILE		SYS1-LIBRAIN					
ADDED TO MASTER		12/28/76					
LAST DATE COPIED		NONE					
LAST UPDATE		03/17/78 1539 *** TEMPORARY UPDATE ***					
PASSWORD		BRDL					
PROGRAMMER		BUN					
PROC. PARAMETER		\$NOJCL					
NOTE-FOLLOWING PROGRAM IS USED FOR HAZARD RUN ONLY							
PROCENN ALLALLALLALLALL		1*1.00L CENCUS		DUMMY PROGRAM HAZARD		T00010 03/17/78	
ALL OTHER SHOWN ARE USED IN RESEARCH ALLOCATION							
PRUAATS ABXXXXH20XXXXXXCFS		20*		7 PHASE I AQUATIC STUDY		000011 01/04/78	
PRUAATS TNBXXXXH20XXXXXXCFS		20*		7 PHASE I AQUATIC STUDY		000012 03/17/78	
PRUAATS 34DXXXXH20XXXXXXCFS		20*		7 PHASE I AQUATIC STUDY		001061 03/13/78	
PRUAATS 24CXXXXH20XXXXXXCFS		20*		7 PHASE I AQUATIC STUDY		001062 03/13/78	
PRUAATS DNXXXXH20XXXXXXCFS		20*		7 PHASE I AQUATIC STUDY		001063 03/13/78	
PRUAATS TNXXXXH20XXXXXXCFS		20*		7 PHASE I AQUATIC STUDY		001064 03/13/78	
PRUAATS TCXXXXH20XXXXXXCFS		20*		7 PHASE I AQUATIC STUDY		001065 03/13/78	
PRUAATS TCXXXXH20XXXXXXCFS		20*		7 PHASE I AQUATIC STUDY		001066 03/13/78	
PRUAATS TNXXXXH20XXXXXXCFS		20*		7 PHASE I AQUATIC STUDY		001067 03/13/78	
PRUAATS DNXXXXH20XXXXXXCFS		20*		7 PHASE I AQUATIC STUDY		001068 03/13/78	
PRUAATS 24DXXXXH20XXXXXXCFS		20*		7 PHASE I AQUATIC STUDY		001069 03/13/78	
PRUAATS 34DXXXXH20XXXXXXCFS		20*		7 PHASE I AQUATIC STUDY		001070 03/13/78	
PRUAATS TNBXXXXH20XXXXXXCFS		20*		7 PHASE I AQUATIC STUDY		001071 03/13/78	
PRUAATS ABXXXXH20XXXXXXCFS		20*		7 PHASE I AQUATIC STUDY		001072 03/13/78	
PRUAATS TCXXXXH20XXXXXXCFS		20*		7 PHASE I AQUATIC STUDY		001073 03/13/78	
PRUAATS TNXXXXH20XXXXXXCFS		20*		7 PHASE I AQUATIC STUDY		001074 03/13/78	
PRUAATS DNXXXXH20XXXXXXCFS		20*		7 PHASE I AQUATIC STUDY		001075 02/22/78	
PRUAATS 24DXXXXH20XXXXXXCFS		20*		7 PHASE I AQUATIC STUDY		001076 02/22/78	
PRUAATS 34DXXXXH20XXXXXXCFS		20*		7 PHASE I AQUATIC STUDY		001077 02/22/78	
PRUAATS TNBXXXXH20XXXXXXCFS		20*		7 PHASE I AQUATIC STUDY		001078 02/22/78	
PRUAATS ABXXXXH20XXXXXXCFS		20*		7 PHASE I AQUATIC STUDY		001079 03/13/78	
PRUAATS TCXXXXH20XXXXXXCFS		20*		7 PHASE I AQUATIC STUDY		001080 02/22/78	
PRUAATS TNXXXXH20XXXXXXCFS		20*		7 PHASE I AQUATIC STUDY		001081 02/22/78	
PRUAATS DNXXXXH20XXXXXXCFS		20*		7 PHASE I AQUATIC STUDY		001082 03/13/78	
PRUAATS 24DXXXXH20XXXXXXCFS		20*		7 PHASE I AQUATIC STUDY		001083 02/22/78	
PRUAATS 34DXXXXH20XXXXXXCFS		20*		7 PHASE I AQUATIC STUDY		001084 02/22/78	
PRUAATS TNBXXXXH20XXXXXXCFS		20*		7 PHASE I AQUATIC STUDY		001085 02/22/78	
PRUAATS ABXXXXH20XXXXXXCFS		20*		7 PHASE I AQUATIC STUDY		001086 02/22/78	
PRUAATS TCXXXXH20XXXXXXCFS		20*		7 PHASE I AQUATIC STUDY		001087 02/22/78	
PRUAATS TNXXXXH20XXXXXXCFS		20*		7 PHASE I AQUATIC STUDY		001088 03/14/78	
PRUAATS DNXXXXH20XXXXXXCFS		20*		7 PHASE I AQUATIC STUDY		001089 03/14/78	
PRUAATS 24DXXXXH20XXXXXXCFS		20*		7 PHASE I AQUATIC STUDY		001090 03/14/78	
PRUAATS 34DXXXXH20XXXXXXCFS		20*		7 PHASE I AQUATIC STUDY		001091 03/14/78	
PRUAATS TNBXXXXH20XXXXXXCFS		20*		7 PHASE I AQUATIC STUDY		001092 03/14/78	
PRUAATS ABXXXXH20XXXXXXCFS		20*		7 PHASE I AQUATIC STUDY		001093 03/13/78	
PRUAATS TCXXXXH20XXXXXXCFS		20*		7 PHASE I AQUATIC STUDY		001094 03/13/78	
PRUAATS TNXXXXH20XXXXXXCFS		20*		7 PHASE I AQUATIC STUDY		001095 03/13/78	
PRUAATS DNXXXXH20XXXXXXCFS		20*		7 PHASE I AQUATIC STUDY		001096 03/13/78	
PRUAATS 24DXXXXH20XXXXXXCFS		20*		7 PHASE I AQUATIC STUDY		001097 03/13/78	
PRUAATS 34DXXXXH20XXXXXXCFS		20*		7 PHASE I AQUATIC STUDY		001098 03/13/78	
PRUAATS TNBXXXXH20XXXXXXCFS		20*		7 PHASE I AQUATIC STUDY		001099 03/13/78	
PRUAATS ABXXXXH20XXXXXXCFS		20*		7 PHASE I AQUATIC STUDY		001100 03/13/78	
PRUAATS TCXXXXH20XXXXXXCFS		20*		7 PHASE I AQUATIC STUDY		001101 03/13/78	
PRUAATS TNXXXXH20XXXXXXCFS		20*		7 PHASE I AQUATIC STUDY		001102 03/13/78	

Figure 8. Research Projects for Allocation Evaluation.

These problems are a consequence of HRAM algorithms and statistics. The hazards that are of interest correspond to Equation (3). They are assumed to be log-normally distributed. This assumption is sufficient to allow for the computation of hazard and uncertainty by stochastic methods. The validity of the assumption must be validated by other methods. A set of hazard data will be so treated.

Statistics indicate that theoretical problems may exist with the log-normal distribution assumption. A continuous probability distribution which is the sum of other distributions tends to approach a normal distribution. The more sums involved, the closer is the approach. With most compounds involved here, fish effects involve seven summations; human effects, three. These are probably not large numbers of summations to be of concern. HRAM can, at least in principle, process research projects that involve hazards corresponding to Equation (4). In practice, the interpretation of such results to hazards corresponding to Equation (3) may be difficult. This will be illustrated.

A fundamental concept of statistical sampling (which the Monte-Carlo method simulates) is to provide an estimate of a statistical parameter. The larger the number of simulations, the better the reliability of the estimate. However, a limit must be set, because computer time is involved. For the analysis at hand, each simulation involves 620 computations of Equation (2). With the IBM 360/50 computer, 100 such simulations require 36 minutes. The ramifications of selecting a given number of simulations will be discussed in the next section.

An important consideration involves the credence attached to an objective factor when compared to another. This is complicated by the multi-variable impact of research projects. The objective factor is:

$$([\text{RU}] \text{ current} - [\text{RU}] \text{ post-research})/\text{cost} \quad (12)$$

Factors common to several variables (2 for "AAT," 3 for "LTM") are summed to provide overall objective factors for allocation considerations. If each factor was exact, this would cause no concern. However, this is not the case. H is an estimate of a mean hazard; U is the computed estimate of an exact uncertainty. If one takes products, then differences, and next sums, the factor can be rather inexact. An approach to resolve this problem will be discussed.

Allocation Results and Discussion

The allocation results after one 300 Monte-Carlo simulation run appears in Figure 9. Each line is read as follows:

1. The order of analysis.
2. The project mnemonic.

NEXT MONTE CARLO SAMPLE 300

PROGRAM	VAR	CHE	LOC	MED	POP	POP	EFF	HAZARD	HAZARD	UNCERT	HAZARD	HAZARD	UNCERT	UNCERT	DELTA DEL HU	PROG.COST DOLLARS	RATIO ****
---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
1	AAT	S	ARD	H20	CFS	CFS	309.55	15.19	318.90	8.99	1946.	20.	57.295				
2	AAT	S	TNR	H20	CFS	CFS	110.91	23.71	110.01	12.70	1216.	20.	61.803				
3	AAT	S	340	H20	CFS	CFS	171.34	23.52	166.77	11.79	1982.	20.	99.117				
4	AAT	S	240	H20	CFS	CFS	283.94	17.30	286.64	9.36	2265.	20.	113.237				
5	AAT	S	DN8	H20	CFS	CFS	416.27	19.72	395.09	9.34	4209.	20.	210.442				
6	AAT	S	TNT	H20	CFS	CFS	2304.50	19.67	2286.52	9.96	22300.	20.	1114.579				
7	AAT	S	TCP	H20	CFS	CFS	2118.22	20.55	2033.41	10.35	21172.	20.	1058.575				
8	AAT	S	TCP	H20	FKL	FKL	635.87	8.68	623.03	5.46	2025.	20.	101.227				
9	AAT	S	TNT	H20	FKL	FKL	713.11	6.95	731.99	3.96	2157.	20.	107.858				
10	AAT	S	DN8	H20	FKL	FKL	123.72	6.96	122.37	4.46	307.	20.	15.345				
11	AAT	S	240	H20	FKL	FKL	97.86	7.69	97.32	4.22	339.	20.	16.958				
12	AAT	S	340	H20	FKL	FKL	50.11	7.66	50.11	5.35	117.	20.	5.865				
13	AAT	S	TNR	H20	FKL	FKL	35.21	8.56	35.62	6.16	85.	20.	4.250				
14	AAT	S	ARD	H20	FKL	FKL	126.20	7.54	123.29	4.64	362.	20.	18.123				
15	LTM	S	TCP	H20	CTR	CTR	9.09	82.24	8.53	9.14	644.	400.	1.610				
16	LTM	S	TNT	H20	CTR	CTR	52.86	51.73	50.67	5.96	2369.	400.	5.923				
17	LTM	S	DN8	H20	CTR	CTR	2.18	434.90	2.21	7.58	938.	400.	2.344				
18	LTM	S	340	H20	CTR	CTR	0.24	374.22	3.22	6.74	83.	400.	0.208				
19	LTM	S	TNR	H20	CTR	CTR	0.09	357.29	0.11	9.78	34.	400.	0.086				
20	LTM	S	ARD	H20	CTR	CTR	0.86	324.87	1.02	7.44	298.	400.	0.746				
21	LTM	S	ARD	H20	CTG	CTG	1.26	484.99	1.12	10.67	566.	400.	1.415				
22	LTM	S	TNR	H20	CTG	CTG	0.10	362.32	0.11	15.18	36.	400.	0.090				
23	LTM	S	340	H20	CTG	CTG	0.28	261.44	0.23	8.52	64.	400.	0.161				
24	LTM	S	DN8	H20	CTG	CTG	2.61	344.23	2.34	10.04	827.	400.	2.067				
25	LTM	S	TNT	H20	CTG	CTG	53.08	36.45	51.54	10.00	1384.	400.	3.459				
26	LTM	S	TCP	H20	CTG	CTG	7.94	51.07	8.11	14.91	290.	400.	0.725				
27	LTM	S	ARD	H20	C	C	27.79	30.23	27.87	12.07	506.	400.	1.264				
28	LTM	S	TCP	H20	C	C	186.31	46.76	178.28	15.53	5693.	400.	14.233				
29	LTM	S	TNT	H20	C	C	615.74	39.52	608.90	14.51	15314.	400.	38.284				
30	LTM	S	DN8	H20	C	C	103.07	31.41	102.46	13.17	1866.	400.	4.665				
31	LTM	S	340	H20	C	C	4.34	26.24	4.61	12.56	61.	400.	0.153				
32	LTM	S	TNR	H20	C	C	36.32	35.89	36.45	15.09	757.	400.	1.892				
33	LTM	S	T11	H20	CTR	CTR	0.02	338.34	0.02	16.93	6.	400.	0.014				
34	LTM	S	T11	H20	CTG	CTG	0.02	344.37	0.02	21.27	6.	400.	0.016				
35	LTM	S	T11	H20	C	C	9.93	38.43	10.40	20.20	185.	400.	0.463				
36	LTM	S	260	H20	CTR	CTR	1.25	19.35	1.24	11.35	10.	400.	0.024				
37	LTM	S	260	H20	CTG	CTG	0.53	17.71	0.53	17.71	0.	400.	0.0				
38	LTM	S	260	H20	C	C	7.52	33.95	7.61	16.68	131.	400.	0.327				
39	AAT	S	T11	H20	CFS	CFS	587.98	24.21	595.93	13.51	6335.	20.	316.742				
40	AAT	S	T11	H20	FKL	FKL	208.25	10.81	206.52	7.11	769.	20.	38.430				
41	AAT	S	260	H20	CFS	CFS	82.71	23.28	80.57	11.94	926.	20.	46.278				
42	AAT	S	260	H20	FKL	FKL	23.24	8.77	24.16	6.73	48.	20.	2.408				
43	AAT	S	230	H20	FKL	FKL	37.96	9.77	37.66	7.14	100.	20.	4.977				
44	AAT	S	230	H20	CFS	CFS	111.82	27.09	112.09	15.02	1350.	20.	67.515				
45	LTM	S	230	H20	CTR	CTR	0.11	482.64	0.11	12.05	51.	400.	0.127				
46	LTM	S	230	H20	CTG	CTG	0.10	501.12	0.11	20.36	49.	400.	0.123				
47	LTM	S	230	H20	C	C	5.17	48.50	5.01	20.35	143.	400.	0.358				

* INDICATES A REMOVED NEGATIVE DELTA SIGMA.

Figure 9. Allocation Data from a 300 Monte-Carlo Simulation Run.

3. The variable with appropriate subscripts whose uncertainty is reduced.

4. For the current situation ("prior"), the hazard and hazard uncertainty associated with the variable.

5. For the projected situation after research, the corresponding hazard and hazard uncertainty.

6. The decrease in the 95 percent confidence range, based on Equation (5), due to project performance. Specifically, the upper end of this range, from H to H_U is processed.

7. The project cost.

8. The ratio of item (6) divided by item (7). This is the objective factor for the proposed research project in terms of one variable. As indicated, a project may impact on several variables.

The Log-Normal Hazard Assumption. As an example for consideration, the 300 values of current situation hazard of the CFS effect from "condensate water" are used. Some of the characteristics of this sample population are:

Mean = 2118

Uncertainty = * 20.55

Highest sample value = 111,601 (52.7 x mean)

Lowest sample value = 28 (mean/75.6)

Median = 2017.5

The test performed to assess the distribution is the "goodness of fit" test found in most statistical textbooks such as by Dixon and Massey.¹⁵ The distribution is divided into several intervals and the number of samples that are in each interval is compared to the expected number. For convenience, 10 intervals were used, each expected to include 10 percent of the samples. The analysis yielded a χ^2 statistic of 8.53, which is slightly less than χ^2 ($P = 0.75$) of 9.04 for 7 degrees of freedom. Informally stated, if the log-normal distribution assumption was rejected, there is somewhat more than a 25 percent chance of being wrong. Statistical evidence to reject the assumed distribution is considered weak.

This exercise is reassuring, since if hazard has the log-normal distribution, uncertainty has the attributes that makes Equation (5) a reasonable statement. From a conceptual outlook, this is essential to the methodology.

The hazards presented in Figure 9 are estimates of mean hazards of log-normal distribution. The means are not known; however, inferences can be made as to how close the estimates are to it. The relation involved is Chebyshev's Inequality, which for the variable used here is written:

$$\text{Prob} \left(\text{Log } \bar{H} - \text{Log } H_{\text{mean}} \leq \frac{k \text{ Log } \sqrt{U}}{\sqrt{N}} \right) \geq 1 - 1/k^2 \quad (13)$$

N is the number of samples used to derive \bar{H} and k is a factor arbitrarily chosen. For example, if the \bar{H} above is desired to be within 10 percent of H_{mean} , the probability of this is more than 0.15. For agreement within 20 percent, the probability increases to more than 0.73.

From Equation (13), the hazard computed for the post-research situation is a better estimator of the mean hazard. This hazard can be compared to the deterministic hazard to see approximately how well the two procedures agree. This is done in Table 10 for two effects. There is a general trend for the stochastic computation to generate higher hazards than the deterministic computation. This is expected, as each stochastically-computed hazard is the sum of several individual hazards. Fortunately, these are so distributed that the sums are reasonably represented by a log-normal hazard.

From the viewpoint of general HRAM applications, this poses a problem. Conceptually, projects with hazards corresponding to Equation (4) could be processed. However, these hazards involve additional summations. Theory predicts a wider divergence between stochastic and deterministic results. This is observed as shown below:

Compound	Total Hazard, Table 6	Stochastic Total Hazard
"Condensate water"	2342	4223
2,4,6-Trinitrotoluene	3027	6056
2,3,6-Trinitrotoluene	778	1051
2,4-Dinitrotoluene	516	473
1,3-Dinitrobenzene	496	1102
5-Amino-2,4-dinitrotoluene	488	697
3,4-Dinitrotoluene	190	305
1,3,5-Trinitrobenzene	144	287
2,3-Dinitrotoluene	126	211
2,6-Dinitrotoluene	103	157

The results in column 3 are included with the run print-out. Hazards from both procedures differ by as much as a factor of two. This may indicate that hazards corresponding to Equation (4) are not well-suited to a

log-normal distribution. This could cast doubt on the validity of Equation (12) as an objective factor when comparisons are made to other projects.

TABLE 10. COMPARISON OF HAZARDS: DETERMINISTIC VS. STOCHASTIC

Effect	Compound	Deterministic Hazard, Table 6	Stochastic Hazard, Figure 9
CFS ^a	"Condensate water"	1629	2033
CFS	2,4,6-Trinitrotoluene	1749	2287
CFS	2,3,6-Trinitrotoluene	575	596
CFS	2,4-Dinitrotoluene	249	287
CFS	1,3-Dinitrobenzene	307	395
CFS	5-Amino-2,4-dinitrotoluene	350	319
CFS	3,4-Dinitrotoluene	139	167
CFS	1,3,5-Trinitrobenzene	85	110
CFS	2,3-Dinitrotoluene	92	112
CFS	2,6-Dinitrotoluene	70	81
C	"Condensate water"	153	178
C	2,4,6-Trinitrotoluene	594	609
C	2,3,6-Trinitrotoluene	12	10
C	1,3-Dinitrobenzene	82	102
C	5-Amino-2,4-dinitrotoluene	19	28
C	3,4-Dinitrotoluene	5	5
C	1,3,5-Trinitrobenzene	31	36
C	2,3-Dinitrotoluene	4	5
C	2,6-Dinitrotoluene	8	8

Note: All hazards rounded to the nearest integer.

- a. Table 6 has the summed hazards of CFS and FKL. From Equations (7) and (8), three-fourths of these hazards are due to the CFS effect.

Uncertainty Contributions of Variables to Hazard Uncertainty.

Results from Figure 9 can be used for an analysis of which uncertainties influence the hazard uncertainty. To do this, Equation (3) is rewritten as:

$$H = S \sum_{\text{populations}} C * S * M * B * V * N = S * X \quad (14)$$

S is defined as log-normally distributed. There is confidence that H is log-normally distributed. Then "X" should be log-normally distributed. The following is an approximation from which U_x , which represents the uncertainty contribution from all other variables, can be estimated.

$$U_H = \exp [(\ln U_S)^2 + (\ln U_x)^2] \quad (15)$$

From Equation (15) and appropriate average values of U_S , the following U_x are determined:

Variable	Current Situation		Post-Research Situation	
	U_S	U_x	U_S	U_x
S(CFS)	* 15	* 4.5	* 7	* 4.5
S(FKL)	* 4	* 5.2	* 2	* 5.1
S(C)	* 20	* 6.7	* 7	* 7.0
S(CTR)	*300	* 5.5	* 3	* 7.6
S(CTG)	*300	* 5.4	* 7	* 6.3

These results appear to indicate that in the current situation, with the exception of S(FKL), toxicological factors dominate U_H . After research, non-toxicological factors are of equal or greater effect. A tentative conclusion, based on the comparisons of individual U_H , is that the effect of discharge rate uncertainty predominates over other non-toxicological variables.

An interesting observation is that the U_x for human effects tends to be higher than for fish effects. This is probably caused by the uncertainties associated with fish populations (* 2.3) and with R (* 3.2). Human populations, on the other hand, have much lower uncertainties, while fish hazards are computed with an exact default $R = 1$.

Another observation that can be derived from Equation (15) are the uncertainties that would exist at the completion of the most advanced research projects. For humans, "LTM" is generally the most advanced project, although epidemiology may have potential to refine hazard uncertainties.[†] For fish, a more advanced project exists, that of a

[†] From a real-world standpoint, this may be impractical. Ammunition plant production levels vary widely over a period of time, based on the level of military activity of the nation. Thus, real-world exposures over a long period of time would be difficult to correlate with an observable change in the population.

chronic aquatic toxicity test. The S(CFS) uncertainty after such a project is estimated at " * 2." From Equation (15), the U_H after such a project[†] would be about " * 5.2."

Objective Factors and Their Interpretation

Since each project involves more than one variable, the relevant ratios are summed to provide an overall objective factor. The overall factor is used to rate the proposed research in comparison to factors of other projects. The factors for the projects, determined after 300 Monte-Carlo simulations, appear in Table 11. The most striking feature of this table is the higher ratings that would be given to "AAT" projects over all "LTM" projects. The cost difference between the two projects is a major cause of these ratings.

Table 11 also includes objective factors that would have prevailed if the analysis had been terminated with a smaller number of simulations. The general trend of the results is established rather early. After the 100th simulation, the factor changes become much less marked. Rating transpositions are restricted to closely-valued projects.

An important question is how precise are the objective factors. At the beginning of this section, it was stated that allocation results are expected to be ordered closely to those of hazard results. Table 11 is so ordered; there is not perfect agreement. The worst situation is that of project "AAT" for 5-amino-2,4-dinitrotoluene. Figure 9 suggests this is caused by the relatively low-sided stochastic hazard computation for the CFS effect, and the relatively small difference between its current and post-research uncertainties. The juxtapositions with "LTM" projects are a function of S(C) as compared with the other human effect dose-risk slopes. If S(C) is relatively low, the contribution of other effects to Equation (12) become more important. This is an example of how uncertainty assignments can influence these factors. This influence is not apparent from hazard valuations.

Each objective factor in Table 11 is a sample taken from a probability distribution of Equation (12). This distribution is defined as a function of sample size. If the characteristics of this distribution were known, statements such as embodied in Equation (13) could be made. Since a variance estimate of the uncertainty is not available, this is not the case.

[†] Hazard is assumed to remain constant as a result of such research. This is the most valid conclusion that can be made in the absence of another indication.

TABLE 11. ALLOCATION OBJECTIVE FACTORS OBTAINED AFTER SELECTED MONTE-CARLO SIMULATIONS

Project	Compound	Objective Factors			
		300	200	100	20
AAT	2,4,6-Trinitrotoluene	1223	1310	1183	996
AAT	"Condensate water"	1160	1122	1015	992
AAT	2,3,6-Trinitrotoluene	355	486	515	425
AAT	5-Amino-2,4-dinitrotoluene	115	127	123	369
AAT	1,3-Dinitrobenzene	225	226	184	150
AAT	2,4-Dinitrotoluene	130	116	145	229
AAT	3,4-Dinitrotoluene	105	107	129	72
AAT	2,3-Dinitrotoluene	72	71	86	248
AAT	1,3,5-Trinitrobenzene	65	65	64	70
AAT	2,6-Dinitrotoluene	49	45	43	165
LTM	2,4,6-Trinitrotoluene	48	39	36	129
LTM	"Condensate water"	17	16	18	41
LTM	1,3-Dinitrobenzene	9.1	11	14	13
LTM	1,3,5-Trinitrobenzene	2.1	2.8	2.7	5
LTM	5-Amino-2,4-dinitrotoluene	3.4	3	2.7	3.5
LTM	2,3,6-Trinitrotoluene	0.49	0.72	0.58	0.42
LTM	2,6-Dinitrotoluene	0.35	0.36	0.54	0.46
LTM	3,4-Dinitrotoluene	0.52	0.42	0.46	1.9
LTM	2,3-Dinitrotoluene	0.61	0.75	0.61	0.89

The most convenient way to evaluate the precision of Equation (12) is by replicated simulations. This provides additional samples of each objective factor. The need to do this will depend upon allocation applications. From a practical viewpoint, it may not be needed for current plans. For future HRAM applications, it is worth developing.

As an example, three additional analyses were performed, each consisting of 100 Monte-Carlo simulations. The overall objective factors from these and the previously discussed analysis appear in Table 12.

The probability distribution of Equation (12) is not known, but probably is somewhere intermediate between a log-normal distribution and a normal distribution. Given the four samples for each factor, assuming a normal distribution is probably reasonable. Statistical procedures allow an estimate of confidence limits for mean overall objective factors to be determined. These limits also appear in Table 12.

With four replications, the ordering of projects is somewhat clearer. The project "AAT" for 1,3-dinitrobenzene is still favored over 5-amino-2,4-dinitrotoluene. The ratings for the project for 2,4- and 3,4-dinitrotoluene are probably lower than that for 5-amino-2,4-dinitrotoluene. The rating of project "AAT" for 2,6-dinitrotoluene above "LTM" for TNT is probably valid. The projects as ordered in Table 12 would constitute the recommended ordering for research.

CONCLUSIONS AND RECOMMENDATIONS

HRAM gives the decision-maker insights into several aspects of the TNT wastewater compounds that would have been difficult to attain otherwise.

1. A numerical rating for the hazard of these compounds which takes into account known or estimated environmental, toxicological, discharge and demographic data. One unusual result of the hazard computations is that the largest hazard was from TNT in non-"condensate water" situations. Without taking this into account, TNT would have been a compound of intermediate concern as a "condensate water" constituent.

2. A numerical rating system of hazard that allows for a comparison between different population types. In the analysis, much of the hazard was fish-oriented. For human hazards, the mutagenic or carcinogenic effect predominated. This predomination is not considered conclusive at this stage of data development.

3. A research project rating system based on a plausible economic approach. In the exercise, the research project "AAT" for all nine components considered would have been favored over any "LTM" project. The

TABLE 12. ALLOCATION OBJECTIVE FACTORS AND ESTIMATE OF 90 PERCENT CONFIDENCE INTERVAL OF MEAN
FROM FOUR 100 MONTE-CARLO SIMULATION RUNS

Project	Compound	Objective Factors				90% Confidence Interval	
		1	2	3	4	Low Limit-Mean-High Limit	
AAT	2,4,6-Trinitrotoluene	1183	1794	2029	2115	1435	1780 2125
AAT	"Condensate water"	1015	939	1607	1233	953	1198 1444
AAT	2,3,6-Trinitrotoluene	515	685	464	405	418	517 616
AAT	1,3-Dinitrobenzene	184	151	183	473	123	248 372
AAT	5-Amino-2,4-dinitrotoluene	123	161	252	150	126	171 217
AAT	2,4-Dinitrotoluene	145	158	137	164	139	150 161
AAT	3,4-Dinitrotoluene	129	154	120	42	72	111 151
AAT	2,3-Dinitrotoluene	86	109	82	76	76	88 100
AAT	1,3,5-Trinitrotoluene	64	103	57	66	55	72 89
AAT	2,6-Dinitrotoluene	43	60	74	38	40	54 67
LTM	2,4,6-Trinitrotoluene	36	33	40	39	34	37 40
LTM	"Condensate water"	18	16	15	8.7	11	14 18
LTM	1,3-Dinitrobenzene	14	8.4	12	16	10	13 15
LTM	5-Amino-2,4-dinitrotoluene	2.7	4.4	3.5	2.5	2.6	3.3 4
LTM	1,3,5-Trinitrobenzene	2.7	1.5	1.8	1.8	1.5	1.9 2.4
LTM	2,3,6-Trinitrotoluene	0.58	0.46	1.7	0.23	0.21	0.74 1.3
LTM	3,4-Dinitrotoluene	0.46	1.3	0.72	0.22	0.29	0.68 1.1
LTM	2,6-Dinitrotoluene	0.54	0.42	1.1	0.49	0.38	0.64 0.89
LTM	2,3-Dinitrotoluene	0.61	0.22	0.49	0.51	0.32	0.46 0.59

rating system was demonstrated under different levels of Monte-Carlo simulations for a given run and for replicate runs for a given number of Monte-Carlo simulations. For more accurate ratings, the second procedure is recommended.

Many of the data manipulations employed to develop the data base are highly empirical. Since HRAM is a unique approach to the allocation-decision problem, some may remain empirical. Major emphasis has been on consistent methods to process information. This has included:

- a. The processing of concentration data from "condensate water" sample analysis to provide estimates of Q.
- b. The processing of vaporization and photolysis data to provide estimates of LMD.
- c. The processing of mutagenic bioassay data to provide estimates of S(C).

There is a need to improve these methods.

The computations to determine discharge rates point up the danger of non-critical acceptance of concentration data. The decision-maker should be aware of data-processing procedures used in this exercise. Some of the compounds whose presence in wastewater can be masked in the performance of a gas chromatogram are prime candidates for continued studies. Less empirical methods of assessing concentrations derived under such situations should be developed.

The environmental fate of compounds was of great interest to the conferees at the 23-24 February 1978 meeting. In this analysis, the populations at risk were so spaced in travel time that barring gross misassignments of LMD, the sensitivity of results to LMD were not large.

However, several other mechanisms that occur in the environment, such as biodegradation, adsorption in the sediment and reactions with water, have not been included. Even a rough understanding of these mechanisms, given the diversity of the locations and of the real environment, would be a formidable task. Perhaps a standardized set of fate tests may be a more useful approach to providing data for LMD estimates.

Human effects data processing is an area for improvement. The use of potency factors in this study (see page 39) as a scale factor for S(C) is highly speculative. However, as more data are collected by microbial mutagenic bioassay and mammalian carcinogenic and mutagenic bioassay for compounds, such an approach may gain acceptance.

One observation of hazards (Table 7) was that when default S(CTR) and S(CTG) were assigned, the contributions of these effects were small compared to that from S(C). A restudy of the default value assignment procedures may be merited. Another problem is that, within reasonable limits, there will be dose levels at which a compound causes a CTR and a CTG effect. This is not true for a C effect. This conceptual difference is not yet resolved in mathematical terms amenable to HRAM algorithms.

There will be a continuing need to incorporate new information within the HRAM data format. As one example, after the analysis was completed, octanol-water partition coefficient data became available. This may influence LMD, as it may be an indicator of the ability of a compound to adsorb on sediment. It may also influence R for humans, as a larger amount of compound in sediment would be more liable to removal in water treatment processes. It may even cause non-default R to be refined for fish, which would be indicative of different potentials for compound ingestion by fish.

The TNT wastewater study involved compounds with common discharge points and common uncertainty assignments to many data inputs. This allows for in-depth assessment of allocation results. This will not be true in the general case. Because of statistical treatment of data inputs and uncertainties and stochastic methods, the results incorporate certain unusual features. These features are unavoidable.

First, the assumption of log-normal hazard for projects which involve hazards corresponding to Equation (3) was reasonable. This was in part due to a judicious choice of uncertainties for input data variables. Hazards computed as part of the allocation methodology will not be equal to those computed as part of hazard evaluation. They will tend to be higher. For toxicological studies, which are the major projects of concern for this exercise, Equation (3) is applicable. Conceptually, HRAM should be able to assess projects that involve more general hazards, such as that of a compound for all effects, one effect for all compounds, or one location for all compounds. Realistically, the hazards so computed may not be log-normal. This would cast doubt as to whether the allocation methodology would provide valid results according to the objective factor concept.

Rating of research projects involves the summation of two or more objective factors, since the projects effect the uncertainties of more than one effect. This leads to a numerical valuation which is a function of the random number generation sequence and the number of Monte-Carlo simulations. If one simulation set is used, there may be transpositions in ratings due to statistical variance of factors. For a highly discriminating allocation, several simulation runs are suggested. The size of these runs will be a function of the accuracy desired in the analysis and of computer time costs. Fortunately, such costs at this laboratory are low.

For a "rough look" as to how a group of projects may be allocated, one run with 100-300 Monte-Carlo simulations may suffice. The study showed the effect of a more discriminating approach with four replicates of 100 Monte-Carlo simulations. The potential for one or two position transpositions of ratings from what they should be still exists.

Any user should be aware that HRAM results and recommendations ultimately are based on data inputs and algorithms. There is no objective yardstick upon which the validity of HRAM results rests; this is a common trait of rating systems. HRAM is most dependent upon uncertainty assignments. They were, for the most part, arrived at on the basis of consensus. The allocation has a high degree of subjectivity associated with it. The user should avoid being too entranced at the numbers just because they come from a computer. However, critical reviews and refinements based on experiences with HRAM will enhance the confidence with which HRAM is used. This exercise marks a step in this process.

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APPENDIX A

THE ECONOMIC BASIS FOR HRAM

The adoption of a standard for pollution discharges by a regulator involves the trade-off between two costs: a socioeconomic adverse cost of the pollutant and the cost of abatement. An ideal situation is shown in Figure A-1 for one compound discharge at one location. Both cost functions are well-known; AOB is the socioeconomic cost function and XOY is the abatement cost function. An ideal trade-off (minimize total cost) would cause a standard of Q_0 to be set. Both costs are C_0 .

In reality, the abatement cost function may be fairly well known, but the socioeconomic function is not. Since a regulator bears a public responsibility to provide ample margins of protection, the regulator perceives a function skewed above the socioeconomic cost. As shown in Figure A-2, this curve is RST. The regulator wishes to maintain a socioeconomic cost of C_0 . To do so with the perceived function RST requires a standard of Q_{set} . This required additional abatement at an additional cost of $C_{set} - C_0$.

In HRAM context, Equation (4) represents a point of AOB. Given different levels of Q , a complete curve could be generated. In HRAM context, RST represents the product HU as a function of Q . Of interest is the point S and the perceived cost C_s . S is indicative of some operating capacity, such as full capacity.

The plant operator may accept the existing situation and proceed to spend C_{set} for abatement. As an alternative, he can convince the regulator that research will decrease the uncertainty of the perceived social-cost function. After such research, the situation of Figure A-3 occurs. The perceived function is R'S'T'. Using the same approach as before, the standard can now be increased to Q'_{set} . The corresponding abatement cost is C'_{set} . $C_{set} - C'_{set}$ has been saved.

Prior to this research, the perceived socioeconomic cost of current discharges was C_s . After research, it is C'_s . For a given amount of abatement savings, it can be seen that the optimal research project is that which maximizes $[(C_s - C'_s)/\text{research cost}]$. This can be recognized as the objective factor of HRAM.

But the HRAM problem is often the obverse; to show that a given objective factor maximizes the abatement savings. This can be proven given that XOY is either linear or concave upwards. This is not a stringent limitation.

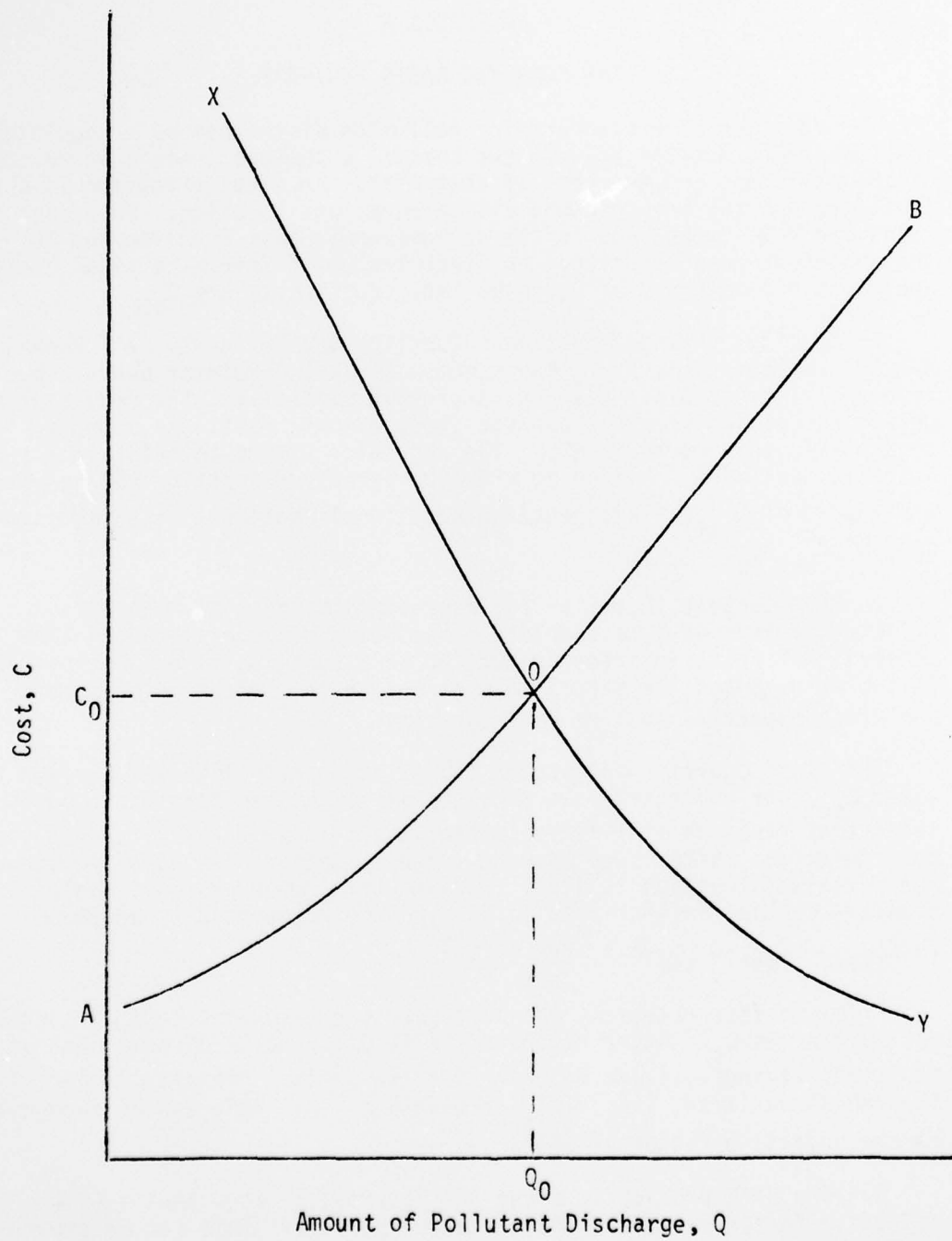


Figure A-1. The Ideal Trade-Off of Socioeconomic and Abatement Costs.

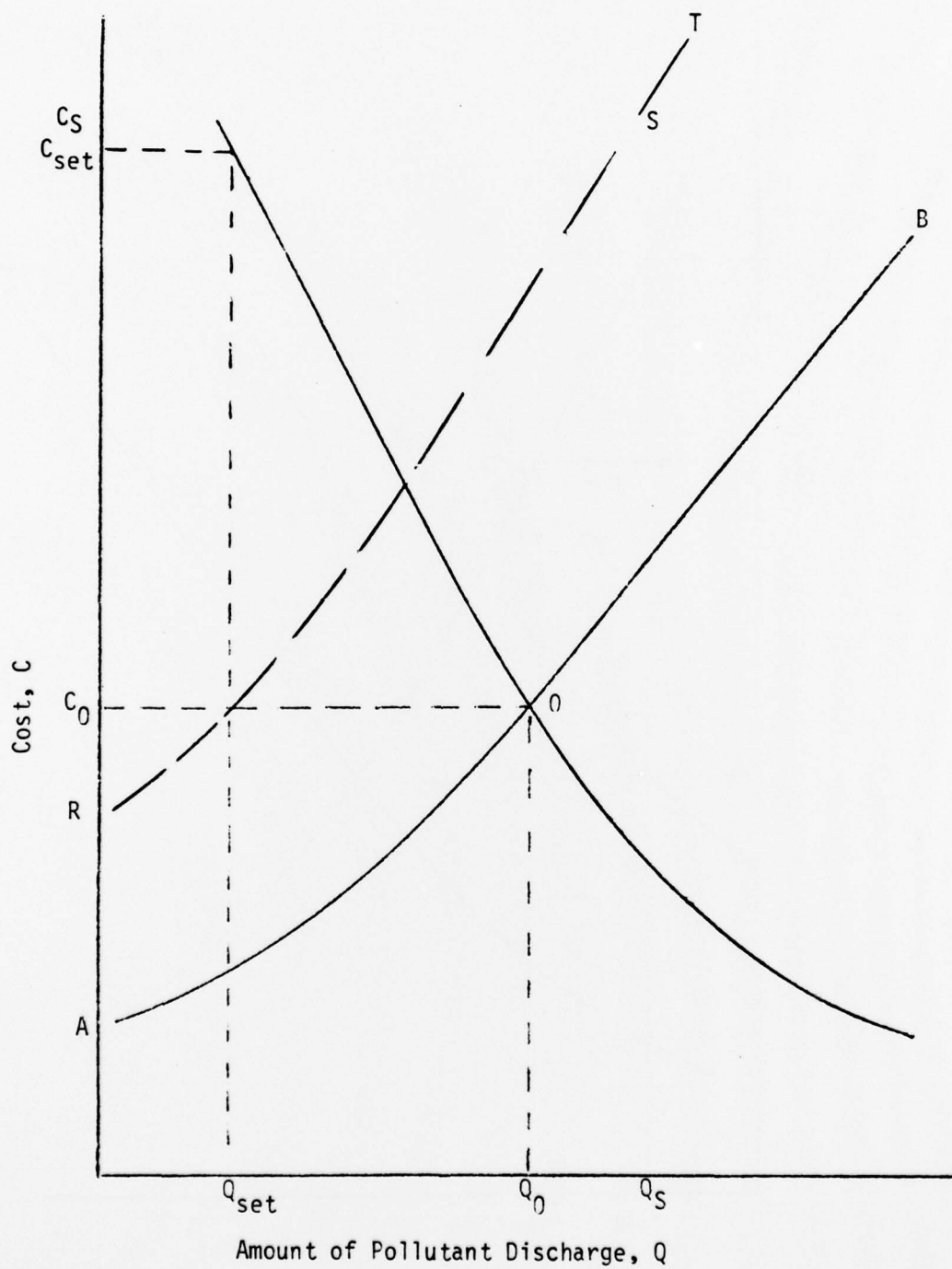


Figure A-2. The Trade-Off Under Conditions of an Uncertain Socioeconomic Cost Function.

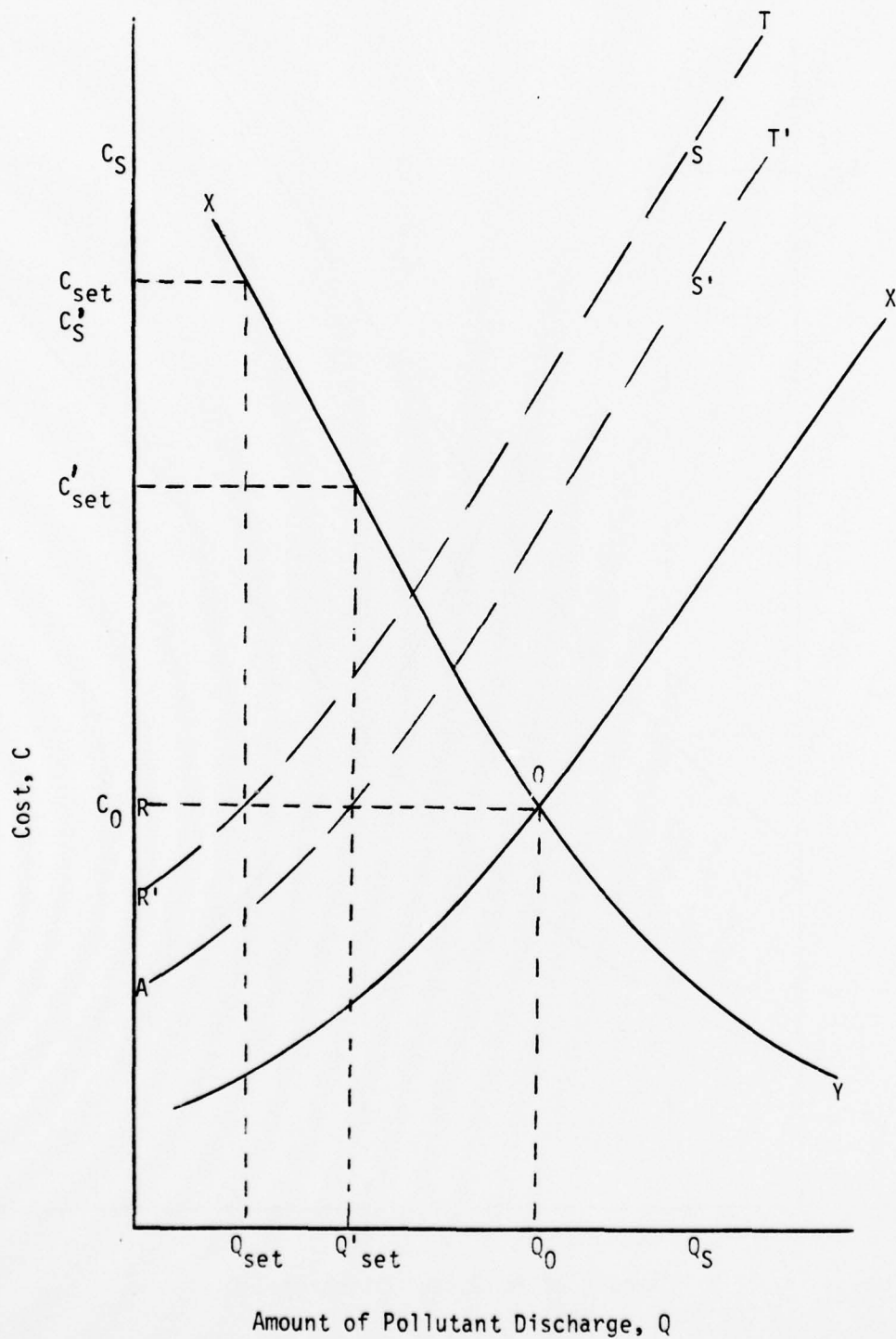


Figure A-3. The Trade-Off Under Condition of a More Certain Socioeconomic Cost Function.

Research may also cause a shift in AOB in that not only does a decrease in uncertainty occur, but so does the refinement of one or more components of hazard. Since these are not a priori known (if they were, the function would have been a priori adjusted), AOB must be assumed constant for the pre- and post-research analysis.

ACRONYMS AND SYMBOLS USED IN THIS REPORT

NOTE: Several subscripts identified in Table 1 and Figure 1 are not cited here.

ACRONYMS

AAT	Acute aquatic bioassay research project
AHED	Adjusted human equivalent dose
C	Carcinogenic or mutagenic effect in humans
CFS	Chronic toxicity effect to fish
CTG	Severe chronic toxic effect to humans
CTR	Mild chronic toxic effect to humans
48EC50	Concentration to effect 50 percent of population after 48-hours exposure
FKL	Episodic fish kill
FSH	Fish population identifier
H2O	Surface water transport medium identifier
HRAM	Hazard Ranking and Allocation Methodology
HUM	Human population identifier
96L50	Concentration lethal to 50 percent of population after 96-hours exposure
LTM	Lifetime mammalian feeding research project
PRO	Research project identifier
RDX	Cyclotrimethylenetrinitramine
TNT	2,4,6-Trinitrotoluene

SYMBOLS OF VARIABLES

C	Concentration (mg/liter) in body of report. In Appendix, a cost
H	Hazard (\$/year); \bar{H} , estimate of mean hazard; H_{mean} , mean hazard
LMD	Environmental disappearance rate constant (year^{-1})
N	Population identifier. In Equation (13), number of simulations.
Q	Discharge rate of compounds to surface waters (kg/year)
R	Water treatment retention factor

S	Dose-risk slope. For human, units are gram^{-1} , for fish, liter/mg-year
SMB	Concentration-dose conversion factor
SMF	Surface water flow (liter/year or ft^3/sec)
SMT	Travel time (days)
U	Uncertainty. Often subscripted with referred variable
V	Socioeconomic cost (\$/population unit) or an undefined variable (see HRAM As Applied To Surface Water Pollution)
X	Non-toxicological overall variable defined in Equation (14)
h	Sample value of hazard in Equation (5)
k	Constant in Equation (13)
χ^2	Chi-squared statistic

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